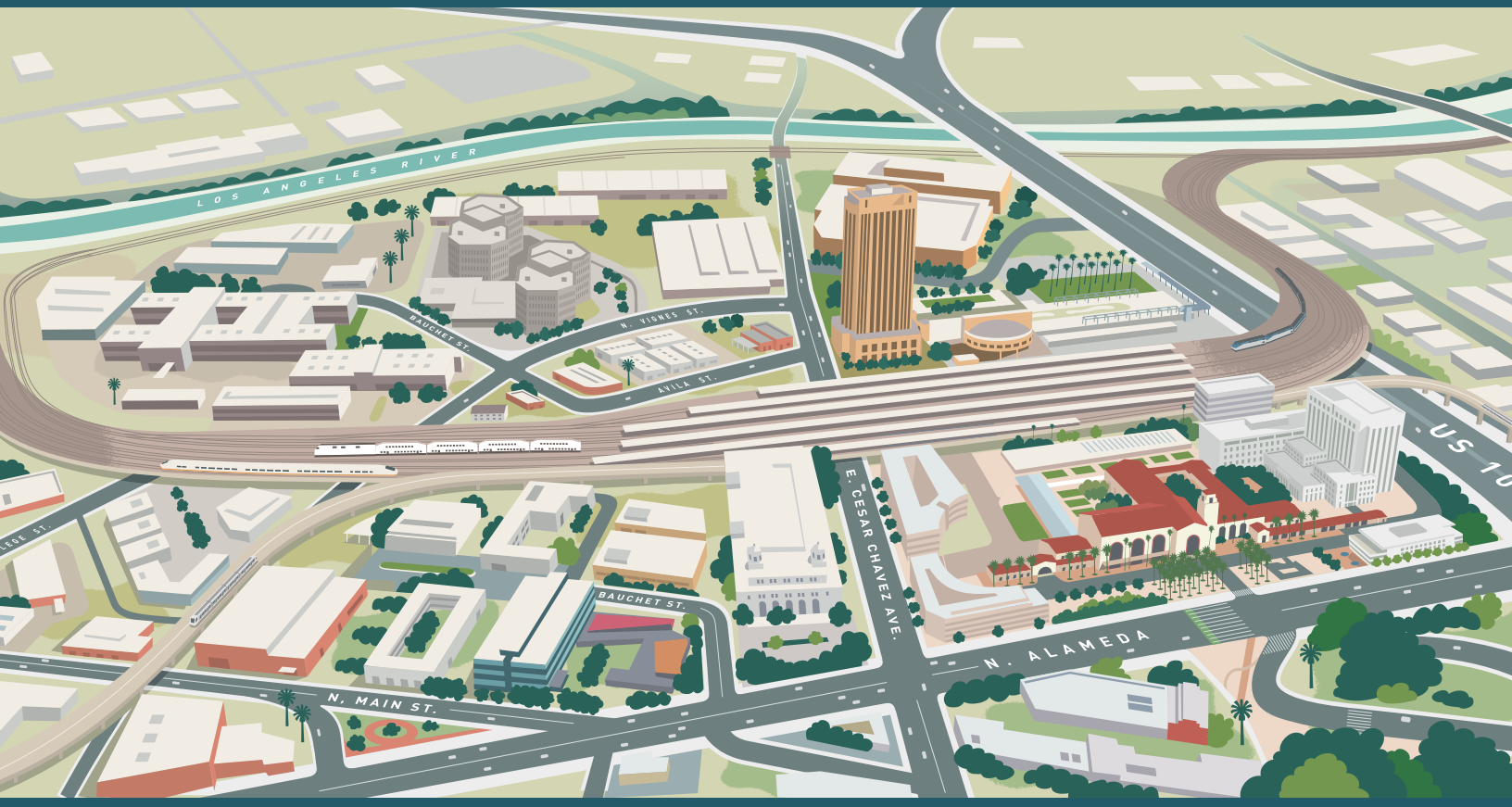
Los Angeles County
Metropolitan Transportation Authority

Link Union Station

Final Environmental Impact Report
(State Clearinghouse No. 2016051071)

CEQA ADDENDUM No. 1

October 2021



Metro

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ACRONYMS

AB	Assembly Bill
AMSL	above mean sea level
CalSTA	California State Transportation Agency
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CHC	Cultural Heritage Commission
CHSRA	California High-Speed Rail Authority
CP	control point
EIR	environmental impact report
GHG	greenhouse gas
HSR	high-speed rail
LADOT	Los Angeles Department of Transportation
LAUS	Los Angeles Union Station
Link US	Link Union Station
LOS	level of service
Metro	Los Angeles County Metropolitan Transportation Authority
MMRP	Mitigation Monitoring and Reporting Program
NEPA	National Environmental Policy Act
NFPA	National Fire Protection Association
No.	number
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O_3	ozone
OHR	City of Los Angeles Office of Historic Resources
PTC	positive train control
project	Link Union Station Project
ROW	right-of-way
RTP	regional transportation plan
SB	Senate Bill
SCAG	Southern California Association of Governments
SCRRA	Southern California Regional Rail Authority
SCS	sustainable communities strategy
SHPO	state historic preservation officer
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
TAG	Transportation Assessment Guidelines
TCR	tribal cultural resource
US-101	United States Highway 101
VCE	vertical circulation element
VMT	vehicle miles traveled

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1.0 Approved Project Overview

The Link Union Station Project (project) certified as part of the Final Environmental Impact Report (EIR), known as the Final EIR project, includes three major project components that are summarized north to south below and depicted on Figure 1-1. Figure 1-1 also depicts the location of the three segments of the project study area addressed in the Final EIR (Segment 1: Throat Segment, Segment 2: Concourse Segment, and Segment 3: Run-Through Segment). The project study area is further described in Section 1.1.

- **Throat and elevated rail yard** – The Final EIR project includes subgrade and structural improvements in Segment 1 of the project study area (throat segment) to increase the elevation of the tracks leading to the rail yard. The Final EIR project includes the addition of one new lead track in the throat segment for a total of six lead tracks to facilitate enhanced operations for regional/intercity rail service providers (Metrolink/Amtrak) and accommodate the planned high-speed rail (HSR) system within a shared track alignment. Regional/intercity and HSR trains would share the two western lead tracks in the throat segment. The rail yard would be elevated approximately 15 feet. New passenger platforms would be constructed on the elevated rail yard, with an underlying assumption that the platform infrastructure and associated vertical circulation elements (VCE; stairs, escalators, and elevators) would be modified at a later date to accommodate the planned HSR system. Platform 1 serving the Gold Line would be lengthened and may also be elevated to optimize east-to-west passenger circulation. The existing railroad bridges in the throat segment at Vignes Street and Cesar Chavez Avenue would also be reconstructed. North of Control Point (CP) Chavez, the Final EIR project also includes safety improvements at the Main Street public-at-grade crossing on the west bank of the Los Angeles River (medians, restriping, signals, and pedestrian and vehicular gate systems) to facilitate future implementation of a quiet zone by the City of Los Angeles.
- **New modified expanded passageway** – The Final EIR project would include expansion of the existing pedestrian passageway in Segment 2 of the project study area (concourse segment) to a 140-foot width to accommodate a substantial increase in passenger capacity, with enhanced passenger amenities while providing points of safety to meet applicable building code and National Fire Protection Association (NFPA) 130 requirements for safe evacuation. The new modified, expanded passageway and associated concourse improvements would facilitate enhanced passenger circulation below the rail yard and provide space for ancillary support functions (back-of-house uses, baggage handling, etc.), transit-serving retail, and office/commercial uses) while creating an opportunity for an outdoor, community-oriented space with new plazas east and west of the elevated rail yard (East and West Plazas). Amtrak ticketing and baggage check-in services would be enhanced, and new carousels would be constructed in a centralized location under the rail yard. A canopy would be constructed over the West Plaza up to 70 feet in height. Individual canopies that would extend up to 25 feet over each platform or a grand canopy that would extend up to 75 feet in height over the rail yard would also be constructed. Platform enhancements and amenities including a new or modified canopy

and furnishings along Platform 4 may also be implemented in the interim condition. The new modified expanded passageway and associated concourse improvements would be functionally modern with enhanced safety elements, Americans with Disabilities accessibility, and passenger amenities in accordance with the basic project objectives.

- **Run-through tracks** – The Final EIR project includes up to 10 new run-through tracks (without a loop track) south of Los Angeles Union Station (LAUS) in Segment 3 of the project study area (run-through segment). Run-through track infrastructure extending from LAUS to the area where the Amtrak lead track is located would be constructed on "common" infrastructure wide enough to support regional/intercity rail trains in the interim and full build-out condition, as well as future HSR trains in the full build-out with HSR condition.

The Final EIR project would also require modifications to United States Highway 101 (US-101) and local streets (including potential street closures and geometric modifications); railroad signal, positive train control (PTC), and communications-related improvements; modifications to the Gold Line light rail platform and tracks; modifications to the main line tracks on the west bank of the Los Angeles River; modifications to Keller Yard and BNSF West Bank Yard (First Street Yard); modifications to the Amtrak lead track; new access roadways to the railroad right-of-way (ROW); additional ROW; new utilities; utility relocations, replacements, and abandonments; and new drainage facilities/water quality improvements.

On June 27, 2019, the Los Angeles County Metropolitan Transportation Authority (Metro) certified the Final EIR (State Clearinghouse Number [No.] 2016051071) for the project.

1.1 Project Location and Study Area

As described in the Final EIR, LAUS is located at 800 Alameda Street in the City of Los Angeles, California. LAUS is bounded by US-101 to the south, Alameda Street to the west, Cesar Chavez Avenue to the north, and Vignes Street to the east. Figure 1-2 depicts the project study area, which encompasses the maximum extent of environmental study associated with potential direct, indirect, and cumulative effects from implementation of on-site infrastructure improvements proposed at and within the vicinity of LAUS. The existing conditions within each segment are summarized north to south below:

- **Segment 1: Throat Segment** – This segment, known as the LAUS throat, includes the area north of the platforms at the LAUS rail yard, from Main Street at the north to Cesar Chavez Avenue at the south. In the throat segment, all arriving and departing trains are required to traverse through the LAUS throat, which includes a complex network of lead tracks, switches, and crossovers. Five lead tracks provide access into and out of the rail yard, except for one location near the Vignes Street Bridge, where it reduces to four lead tracks. Special track work consisting of multiple turnouts and double-slip switches are used in the throat to direct trains into and out of the appropriate assigned terminal platform tracks. Land uses in the vicinity of the throat segment are residential, industrial, and institutional.

- **Segment 2: Concourse Segment** – This segment is between Cesar Chavez Avenue and US-101 and includes LAUS, the rail yard, the Garden Tracks (stub-end tracks where private train cars are currently stored, just north of the platforms and adjacent to the existing Gold Line aerial guideway), the East Portal Building, the baggage handling building with associated parking areas and access roads, the ticketing/waiting halls, and the 28-foot-wide pedestrian passageway with connecting ramps and stairways below the rail yard. Land uses in the vicinity of the concourse segment are residential, commercial, and public.
- **Segment 3: Run-Through Segment** – This segment is south of LAUS and extends east to west from Alameda Street to the west bank of the Los Angeles River and north to south from Keller Yard to CP Olympic. This segment includes US-101, the Commercial Street/Ducommun Street corridor, Metro Red and Purple Lines Maintenance Yard (Division 20 Rail Yard), BNSF West Bank Yard, Keller Yard, the main line tracks on the west bank of the Los Angeles River from Keller Yard to CP Olympic, and the Amtrak lead track connecting the main line tracks with Amtrak's Los Angeles Maintenance Facility in the vicinity of 8th Street. Land uses in the vicinity of the run-through segment are primarily industrial and manufacturing.

The project study area has a dense street network ranging from major highways to local city streets. The roadways within the project study area include the El Monte Busway, US-101, Bolero Lane, Leroy Street, Bloom Street, Cesar Chavez Avenue, Commercial Street, Ducommun Street, Jackson Street, Temple Street, Banning Street, 1st Street Yard, Alameda Street, Garey Street, Vignes Street, Main Street, Aliso Street, Avila Street, Bauchet Street, and Center Street.

1.2 Purpose of Addendum Number 1 to the EIR

The purpose of the California Environmental Quality Act (CEQA) Addendum No. 1 to the Link Union Station (Link US) project Final EIR is to document and evaluate modifications to the project that occurred after the Final EIR was certified (June 27, 2019). CEQA Guidelines Section 15164(a) states, "The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred."

Section 15162(a) calls for the preparation of a subsequent EIR when any of the following have occurred:

1. Substantial changes are proposed in the project, which would require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which would require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effect; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, such as:
    a. One or more significant effects was not discussed in the previous EIR;
    b. Significant effects previously examined will be substantially more severe;
    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Pursuant to the above CEQA directive, Addendum No. 1 has been prepared to address the following:

1. Unsatisfactory LOS causing delay is no longer considered a significant impact under CEQA, pursuant to SB 743 and Public Resources Code section 21099(b)(2). In addition, pursuant to the requirements of Senate Bill (SB) 743 and the 2018 CEQA Guidelines Appendix G environmental checklist, the Los Angeles Department of Transportation (LADOT) adopted new vehicle miles traveled (VMT) analysis guidance (July 2019) and methodology requirements (July 2020). Final EIR Section 3.1 included a qualitative evaluation of transportation impacts in relation to VMT, which is now required by CEQA Guidelines Section 15064.3 (b) and LADOT's updated Transportation Assessment Guidelines (TAG); thus, Addendum No.1 addresses the updated transportation analysis based on the new CEQA Guidelines and LADOT's updated TAG.
2. Metro determined that the following changes to the approved Mitigation Monitoring and Reporting Program (MMRP) are required:
    - Seven minor corrections to previously approved mitigation measures
    - Removal of one mitigation measure because level of service, considered in the Final EIR, is no longer a significant impact under CEQA, and the updated VMT analysis shows that the measure is no longer required
3. Lastly, project modifications have been identified through the design process that have occurred subsequent to certification of the Final EIR. Through further coordination with the California High-Speed Rail Authority (CHSRA) and Southern California Regional Rail Authority, additional design development has resulted in the need for modifications to the Final EIR project in Segment 2, which include updates to the construction approach for Platforms 2 and 3 and Tracks 3 through 6 in the LAUS rail yard and the associated configuration and length of VCEs for these platforms.

Metro determined that an addendum is the appropriate CEQA document to evaluate and disclose the project modifications, updated transportation analysis, and changes to the approved Final EIR MMRP for the following reasons:

- The updated transportation analysis, changes to the Final EIR MMRP, and project modifications would not result in new significant or more substantial impacts than what is already described in the Final EIR;
- Metro would implement the Final EIR MMRP, as revised, which would continue to reduce significant environmental impacts as described in the Final EIR.
- CEQA Addendum No. 1 demonstrates why the updated transportation analysis, changes to the approved Final EIR MMRP, and project modifications are consistent with the analysis in the Final EIR and would not result in new or substantially more severe significant impact(s).

Pursuant to the California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, Section 15164(a), Metro, as the CEQA lead agency, has prepared CEQA Addendum No.1 to the Final EIR to address the updated transportation analysis, changes to the approved Final EIR MMRP, and project modifications, all three of which represent minor changes and additions to the Final EIR project, however, would not require preparation of a subsequent EIR because they do not meet the requirements of Section 15162.

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Figure 1-1. Final Environmental Impact Report Major Project Components

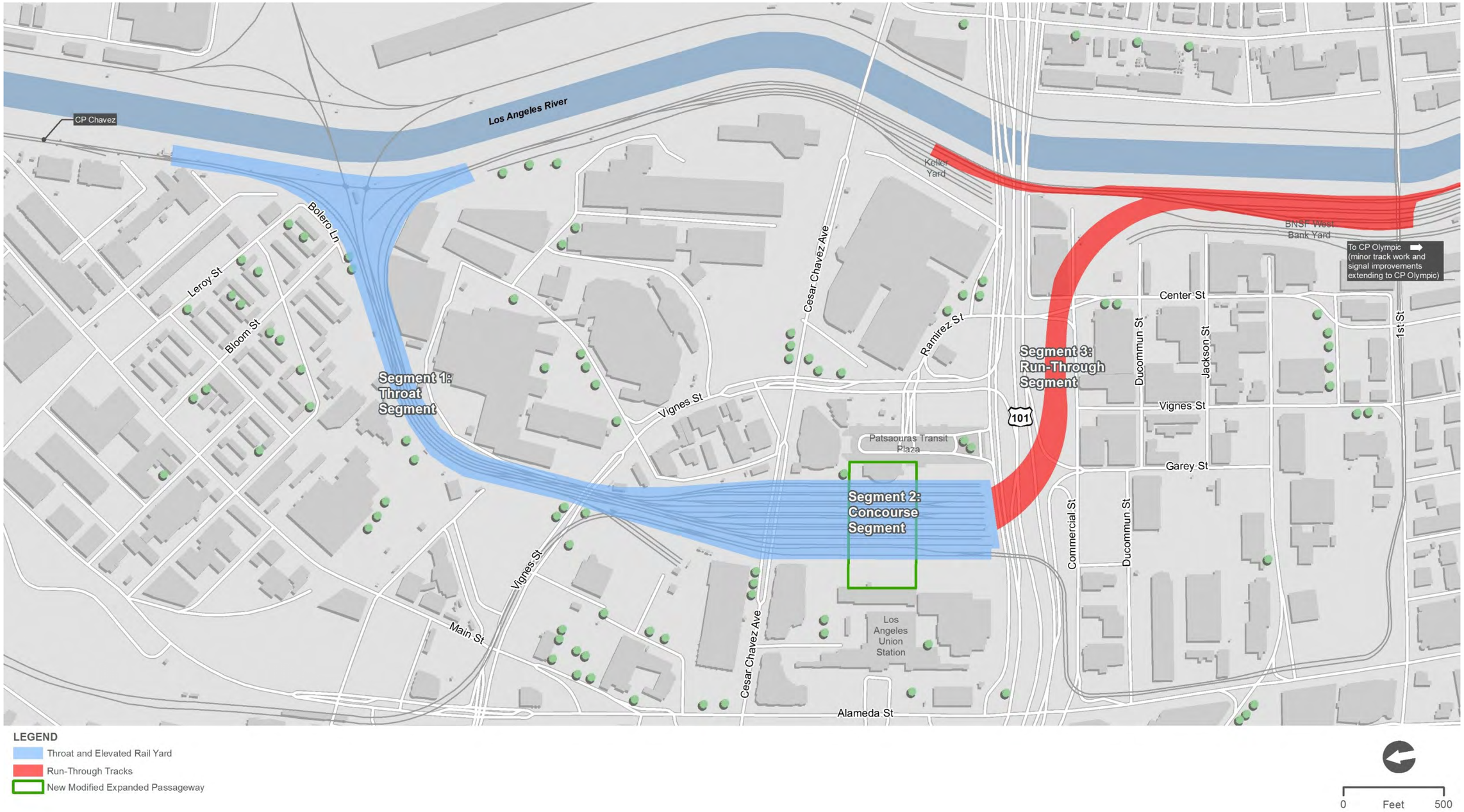

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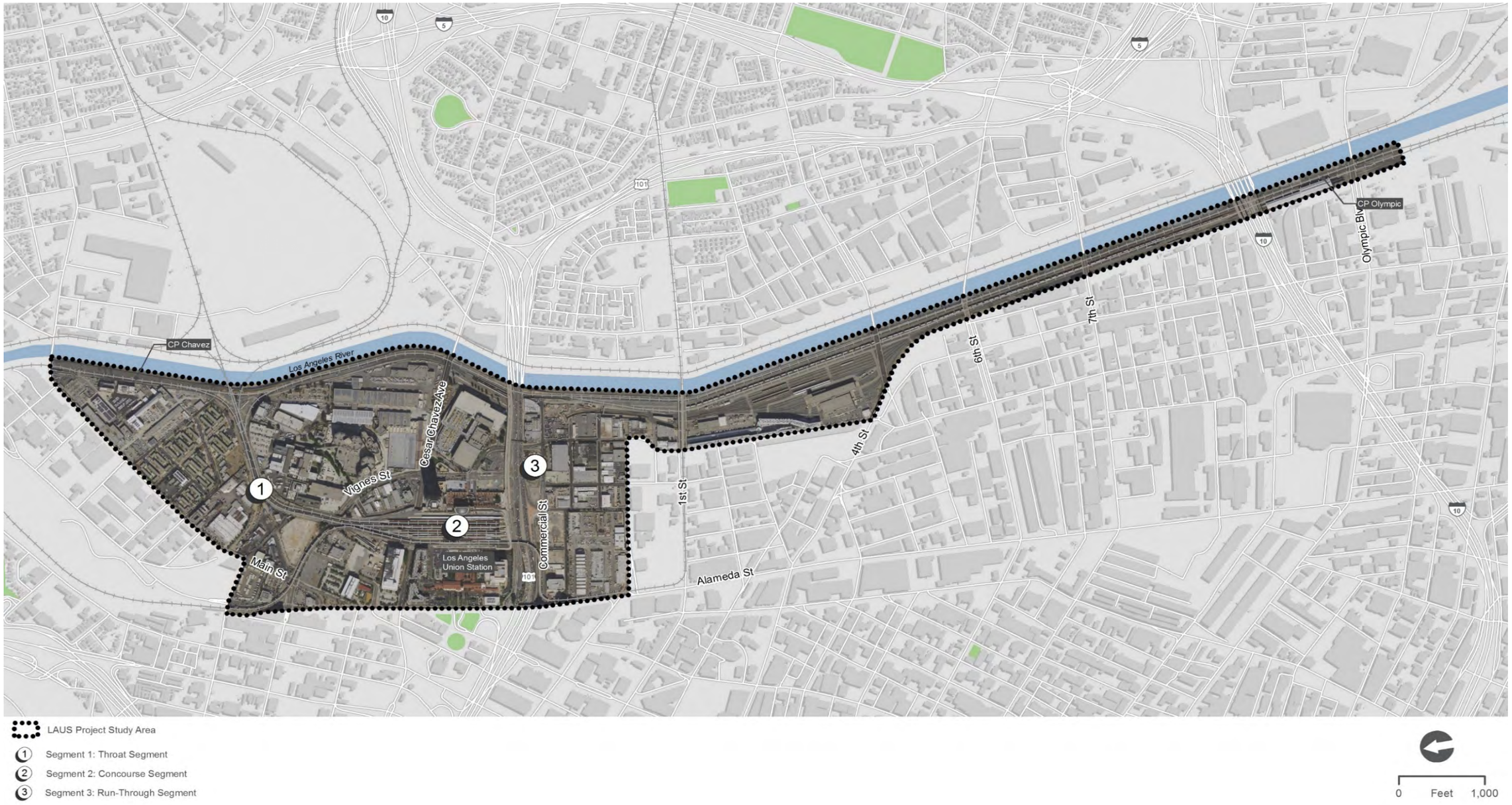
Figure 1-2. Final Environmental Impact Report Project Study Area



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2.0 Previous Environmental Review

Metro prepared a Draft EIR for the project and circulated that document for a 45-day public review period, beginning on January 17, 2019, and ending on March 4, 2019. The document was made available to the public at the Los Angeles Central Library, Chinatown Branch Library, Benjamin Franklin Branch Library, Lincoln Heights Branch Library, Little Tokyo Branch Library, LAUS/Metro Library, and the Metro project website. Following the close of the public comment period, a Final EIR was prepared that included modifications to the Draft EIR project, the complete Draft EIR with strikeout/underline text as applicable, an Executive Summary, and responses to all written and oral comments received during the public review period for the Draft EIR. Metro certified the Final EIR and adopted the Findings of Fact and Statement of Overriding Considerations and MMRP on June 27, 2019 (State Clearinghouse No. 2016051071). The environmental evaluation of modifications associated with the approved Final EIR project is contained in Table 2-2 of the Final EIR, and supporting documentation is included in Chapter 10 and Appendix P of the Final EIR.

The Final EIR identified mitigation measures specific to the following topics: land use and planning, transportation and traffic, aesthetics, air quality and global climate change, noise and vibration, biological resources, hydrology and water quality, geology and soils, hazards and hazardous materials, and cultural resources.

In addition, the Final EIR disclosed significant and unavoidable impacts related to air quality (short-term construction), noise (short-term construction), and cultural resources (long-term operations), but no feasible mitigation measures were identified to reduce impacts to a less than significant level. The Notice of Determination was filed with the County Clerk on June 27, 2019.

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3.0 Updated Transportation Analysis, Changes to the Mitigation Monitoring and Reporting Program, and Project Modifications

3.1 Updated Transportation Analysis: Vehicle Miles Traveled Methodology

3.1.1 Summary of Final EIR Transportation and Traffic Analysis

For the purposes of comparison, the Final EIR transportation and traffic analysis is summarized below, under each evaluation topic considered:

Construction Related Impacts

The Final EIR concluded that construction of the project would result in construction related traffic consisting of equipment, employee vehicles, deliveries of construction material, and hauling of landfill materials in trucks. As summarized in Table 3-1, the Final EIR identified the following temporary local street closures that would be required during construction.

Table 3-1. Temporary Street Closures

Project Segment	Street	Duration
Segment 1 – Throat Segment	Vignes Street	During reconstruction of Vignes Street Bridge
Segment 2 – Concourse Segment	Cesar Chavez Avenue	During demolition of the existing bridge
Segment 3 – Run-Through Segment	El Monte Busway traffic lanes	Short-term overnight closures
	US-101	Short-term overnight closures for 8-12 weeks on weekends
	Southbound ramps at Commercial Street	Short-term overnight closures
	Center Street	Short-term overnight or weekend closures
	Commercial Street	Short-term overnight or weekend closures

Study Area Intersection Level of Service (LOS). The Final EIR concluded that for the Year 2031 plus project construction condition and/or scenario would result in two intersections performing at an unsatisfactory LOS or delay during traffic peak hours (AM or PM) during construction. These include the following intersections:

1. Vignes Street/Main Street (LOS F – PM peak hour)
2. Mission Road/Cesar Chavez Avenue (LOS E – AM peak hour)

This was considered a significant impact. Implementation of Mitigation Measure TR-1 (Prepare a Construction TMP) would reduce construction impacts on the impacted study area intersections to a level less than significant. This measure, as explained below, is also required to reduce other impacts to a level less than significant.

Design Feature Hazards

Existing roadways and intersections may be subject to temporary detours and lane blockages at multiple locations throughout the traffic study area during construction activities, including portions of the US-101. As a result, construction activities associated with the Final EIR project would result in temporary construction-related roadway hazards to motorists, pedestrians, and bicyclists in the traffic study area. This is considered a significant impact. Implementation of Mitigation Measure TR-1, would reduce impacts associated with construction hazards to a level less than significant.

Emergency Access

Cesar Chavez Avenue and Alameda Street are designated disaster routes and the US-101 is a designated disaster route freeway within the project area. As noted in Table 3-1, construction of the Final EIR project would require temporary road closures and affect traffic through detour routes and additional vehicles on the existing roadway network. Specifically, construction related traffic along Vignes Street, Cesar Chavez Avenue, US-101, and Alameda Street could interfere with emergency response and access. Although construction would require some temporary roadway closures, not all of the roadway closures would occur at the same time, and other roadways would be available for evacuation. Interference with emergency access during project construction could occur and this is considered a significant impact. However, with implementation of Mitigation Measure TR-1 impacts associated with emergency access during construction would be reduced to a level less than significant.

Conflicts with Public Transit, Bicycle and Pedestrian Policies, Plans, or Programs

Construction activities associated with the Final EIR project (e.g., construction of the lead tracks, rail yard tracks, and associated platform improvements) could cause potential schedule delays and increased waiting times at LAUS and temporarily disrupt rail commuter travel patterns and facilities (e.g., Gold Line, Red Line, and Purple Line platforms) in the area. This would conflict with regional/intercity rail and transit service performance thresholds. These potential delays to

rail services are considered a significant impact. However, with implementation of Mitigation Measure TR-3, impacts would be reduced to a level less than significant.

Los Angeles Department of Transportation's Dash Route D, which uses Center Street, would also be affected by construction activities associated with the Final EIR project. The construction of the Final EIR project has the potential to affect the bus schedule for this route through a combination of detours, temporary road closures, and changes in scheduling. Potential temporary disruption to bus services in the area is considered a significant impact. However, with implementation of Mitigation Measure TR-1, impacts on bus service operators during construction activities would be reduced to a level less than significant.

For pedestrians and bicyclists, construction activities associated with the Final EIR project would temporarily affect access to LAUS as a result of detours, temporary road closures, and construction work zones. Potential temporary disruption to bicycle and pedestrian facilities in the area is considered a significant impact. Implementation of Mitigation Measure TR-1 would reduce impacts to a level less than significant. In addition, the Final EIR states that appropriate safety provisions would be required to minimize disruptions to pedestrian movement through LAUS including sequencing construction within the rail yard and passenger concourse and maintaining safe and accessible access to rail platforms. With implementation of Mitigation Measure TR-1, impacts on pedestrian and bicycle facilities during construction activities would be reduced to a level less than significant.

Operational Related Impacts

A summary of the operational-related impacts and significance determinations from the Final EIR is presented below.

Study Area Intersection LOS

For the Year 2031 plus project conditions, the Final EIR concluded that one intersection would perform at an unsatisfactory LOS causing delay during the PM peak hour throughout operation. This includes the following intersection:

- Center Street/Commercial Street (LOS F – PM peak hour)

With implementation of Mitigation Measure TR-2 (Install Traffic Signal), LOS at the Center Street/Commercial Street intersection would operate at a LOS B during the PM peak hour. With implementation of Mitigation Measure TR-2, these LOS impacts would be reduced to a level less than significant.

For the Year 2040 plus project conditions, the same intersection (Center Street/Commercial Street) would perform at an unsatisfactory LOS causing delay during the PM peak hour throughout operations. Similar to Year 2031 plus project conditions, the implementation of Mitigation Measure TR-2 would result in the Center Street/Commercial intersection operating at a LOS B during the PM peak hour. With implementation of Mitigation Measure TR-2, LOS impacts would be reduced to a level less than significant.

Study Area Freeway Mainline LOS

During both Year 2031 without project and Year 2031 plus project conditions, the US-101 mainline segments evaluated would perform at an unsatisfactory LOS during the AM or PM peak hours. This includes the following freeway mainline segments:

- US-101 North of Vignes Street – Northbound and Southbound (LOS F – AM peak hour)
- Post Mile 0.45 – Northbound and Southbound (LOS F – PM peak hour)

The FEIR concluded that the volume to capacity ratio does not increase with the Final EIR project; therefore, traffic generated by the project would not have an impact on US-101 operating conditions during the peak hours. No impacts would occur during operation of the Final EIR project.

During both Year 2040 without project and Year 2040 plus project conditions, the same freeway mainline segments discussed above would perform at an unsatisfactory LOS during the AM and PM traffic peak hours. Similar to Year 2031 conditions, Year 2040 plus project traffic would not have an impact on US-101 operating conditions during the peak hours. Therefore, no impacts would occur during operation of the Final EIR project.

Design Feature Hazards

All project features, including new roadway intersections and pedestrian connections, would be designed and constructed to comply with applicable agency standards and specifications to maximize safety for both motorized and non-motorized forms of transportation. In addition, project-related infrastructure improvements would not create sharp curves or dangerous intersections in the traffic study area. Therefore, impacts are considered less than significant.

Emergency Access

Upon completion of construction, no changes would be made to the identified evacuation routes designated by the City. Other areas within LAUS, such as West Plaza and Patsaouras Transit Plaza would provide adequate emergency access via the fire lane network. Planned internal roadway reconfigurations and associated modifications would also be coordinated and approved by the Fire Marshal to ensure adequate access for emergency service providers. Passenger movement through LAUS would be accomplished through adherence to all applicable National Fire Protection Association codes and requirements for passenger and emergency evacuations. Impacts are considered less than significant.

Conflicts with Public Transit, Bicycle and Pedestrian Policies, Plans, or Programs

Operation of the Final EIR project is consistent with the plans and policies relative to expansion of existing transportation options and increased rail service in the Southern California. Of the plans and policies cited in the Final EIR, operation of the Final EIR project is consistent with Metrolink's Southern California Optimized Rail Expansion Program, *California Transportation Plan 2040* (California Department of Transportation [Caltrans] 2016), *2016 Regional*

Transportation Plan/ Sustainable Communities Strategy, *California State Rail Plan: Connecting California* (Caltrans 2018), and *Draft Revised 2018 Business Plan* (CHSRA 2018) and would result in beneficial impacts associated with the new run-through service, enhanced station capacity, and accessibility in the area.

The roadway improvements to Center Street, Commercial Street, Vignes Street, and Cesar Chavez Avenue would support improved bicycle and pedestrian accessibility in accordance with Connect US Action Plan and the City's *Mobility Plan 2035*. These include the provision of cycle tracks and sidewalks along Center Street from Ducommum Street to US-101; and reconstruction of Vignes Street Bridge and Cesar Chavez Avenue Bridge to allow sufficient width of ROW (100 feet) and roadways (70 feet) in alignment with the City's *Mobility Plan 2035* and Downtown Los Angeles Community Plan updates.

Although the Final EIR project would be generally consistent the City's *Mobility Plan 2035*, the Final EIR does acknowledge operation of the Final EIR project would conflict with the City's *Mobility Plan 2035* Policy 2.12. Policy 2.12 includes recommendations to include walkway and bikeway facilities when installing a new bridge or exclusive transit ROW and to provide safe connections between the areas that are not directly accessible because of barriers such as rail lines and freeways. This conflict is considered a significant impact. Implementation of Mitigation Measure LU-1, which would improve connectivity between neighborhoods surrounding LAUS and facilitate cycling and walking in the project study area through the provision of Class II or IV bike lanes along Commercial Street from Alameda Street to Center Street, would reduce impacts to a level less than significant.

Indirect Impacts

The Final EIR project would not result in indirect impacts for any transportation and traffic threshold. No impacts would occur.

3.1.2 Description

As discussed above, subsequent to certification of the Final EIR, pursuant to the requirements of SB 743 and updated CEQA Guidelines, the City of Los Angeles adopted new guidance and impact assessment methodology for assessing transportation impacts using a VMT analysis approach. Based on the project inherently reducing VMT, Metro prepared the *Link US Project Traffic Impact Assessment with Vehicle Miles Traveled Analysis* (October 2021) in compliance with SB 743, the current CEQA Guidelines and LADOT's updated TAG (Appendix A).

LADOT's updated TAG methodology is broadly divided into two categories (CEQA and non-CEQA transportation analysis). CEQA Addendum No. 1 includes an environmental evaluation of the project using the LADOT's CEQA transportation analysis thresholds. The updated transportation analysis addressing VMT was prepared to replace the previously completed level of service (LOS) analysis contained in Table 2-1, Appendix P, and Chapter 10 of the Final EIR. As shown below, the Final EIR already addressed the non-CEQA Transportation Analysis topics that are part of LADOTs updated TAG related to pedestrian, bicycle and transit

access, project access, safety and circulation, and project construction; therefore, these topics are not addressed as part of the updated transportation analysis or considered as part of CEQA Addendum No. 1:

1. CEQA Transportation Analysis – CEQA Addendum No. 1 addresses the following thresholds adopted by LADOT:
    - ***Threshold T-1.*** Would the project be consistent with local plans, programs, ordinances, or policies?
    - ***Threshold T-2.1.*** For a land use project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?
    - ***Threshold T-2.2.*** For a transportation project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(2)?
    - ***Threshold T-3.0.*** Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
2. Non-CEQA Transportation Analysis – As discussed above, the environmental analysis for topics related to pedestrian, bicycle and transit access, project access, safety and circulation, and project construction was already performed as part of the Final EIR; therefore, it is not addressed in Appendix A or as part of CEQA Addendum No. 1.

A summary of the updated CEQA transportation analysis results is provided below.

3.1.3 Consistency with Local Plans, Programs, Ordinances or Policies (Threshold T-1)

Multiple local and regional plans, programs, ordinances, and policies provide a framework for transportation and mobility planning in the project study area. The key plans, programs, ordinances, and policies that focus on the safety and performance of the transportation system that were evaluated for consistency as documented in the updated transportation analysis Appendix A) are listed below:

1. Los Angeles Mobility Plan 2035, September 7, 2016
2. Plan for a Healthy LA, March 2015
3. Downtown LA Community Plan, Spring 2021
4. Central City North Community Plan, September 7, 2016
5. Alameda District Specific Plan, June 18, 1996
6. Los Angeles Municipal Code (LAMC) Section 12.21.A.16 (Bicycle Parking), June 30, 2021
7. LAMC Section 12.26J (Transportation Demand Management Ordinance), June 30, 2021
8. Vision Zero Action Plan and Corridor Plans, November 2019

9. Streetscape Plans (Livable Boulevard Streetscape Plan, Exposition Boulevard Streetscape Plan)
10. Citywide Design Guidelines for Residential, Commercial, and Industrial Development, October 24, 2019
11. LADOT Manual of Policies and Procedures (Design Standards) July 2019

In addition to the list above, the checklist presented in Appendix D of the LADOT's updated TAG that includes the traffic related policies required to be considered as part of a VMT analysis was also completed as presented in Table 5-1 of the *Link US Project Traffic Impact Assessment with Vehicle Miles Traveled Analysis* (Appendix A). Based on the results of the updated transportation analysis, the project is consistent with all the listed plans, programs, ordinances, and policies and would contribute to an overall reduction in VMT since the transportation policies, or standards adopted to protect the environment are those that support multi-modal transportation options and a reduction in VMT.

3.1.4 Vehicle Miles Traveled Analysis (Thresholds T-2.1 and T-2.2)

VMT analysis for the project was compared under two different thresholds per LADOTs updated TAG including substantial VMT for *land use projects*, and additional automobile travel for *transportation projects*. Both these thresholds were compared in both short term VMT impacts and cumulative VMT impacts.

Vehicle Miles Traveled – Land Use Project (Threshold T-2.1)

The City of Los Angeles' VMT calculator Version 1.3 was used to calculate the number of trips and VMT generated by households and employees as a result of project implementation.

The city-developed VMT thresholds are presented in Table 3-2. The Area Planning Commission boundaries are presented on Figure 3-1. The project is located in the Central Area Planning Commission zone and would be subject to the corresponding VMT thresholds (Table 3-2). No household related VMT would be generated because the project does not include any dwelling units; although approximately 7.4 VMT would be generated per employee based on the proposed retail, fast food, and office land uses that would be implemented when the concourse and modified expanded passageway are implemented. As shown in Table 3-2, VMT generated as a result of the project would be below the Central Area Planning Commission zone's threshold of 7.6 VMT per employee. Additionally, pursuant to CEQA Guidelines Section 15064.3(b)(1), "Land use projects within 0.5 mile of an existing transit stop or stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact."

The Southern California Association of Governments (SCAG) is the Metropolitan Planning Organization for the six-county (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) region in which the project is located. SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is the regional planning document applicable to complex,

planned transportation projects, including the Link US project (SCAG 2016). The project has been compared with the SCAG RTP/SCS, and implementation of the project would not change the existing land use of the project site. The project involves the improvement of an existing transportation facility and, as such, the project would be compatible and consistent with SCAG's RTP/SCS designation. Therefore, there are no short-term or cumulative VMT impacts from the project.

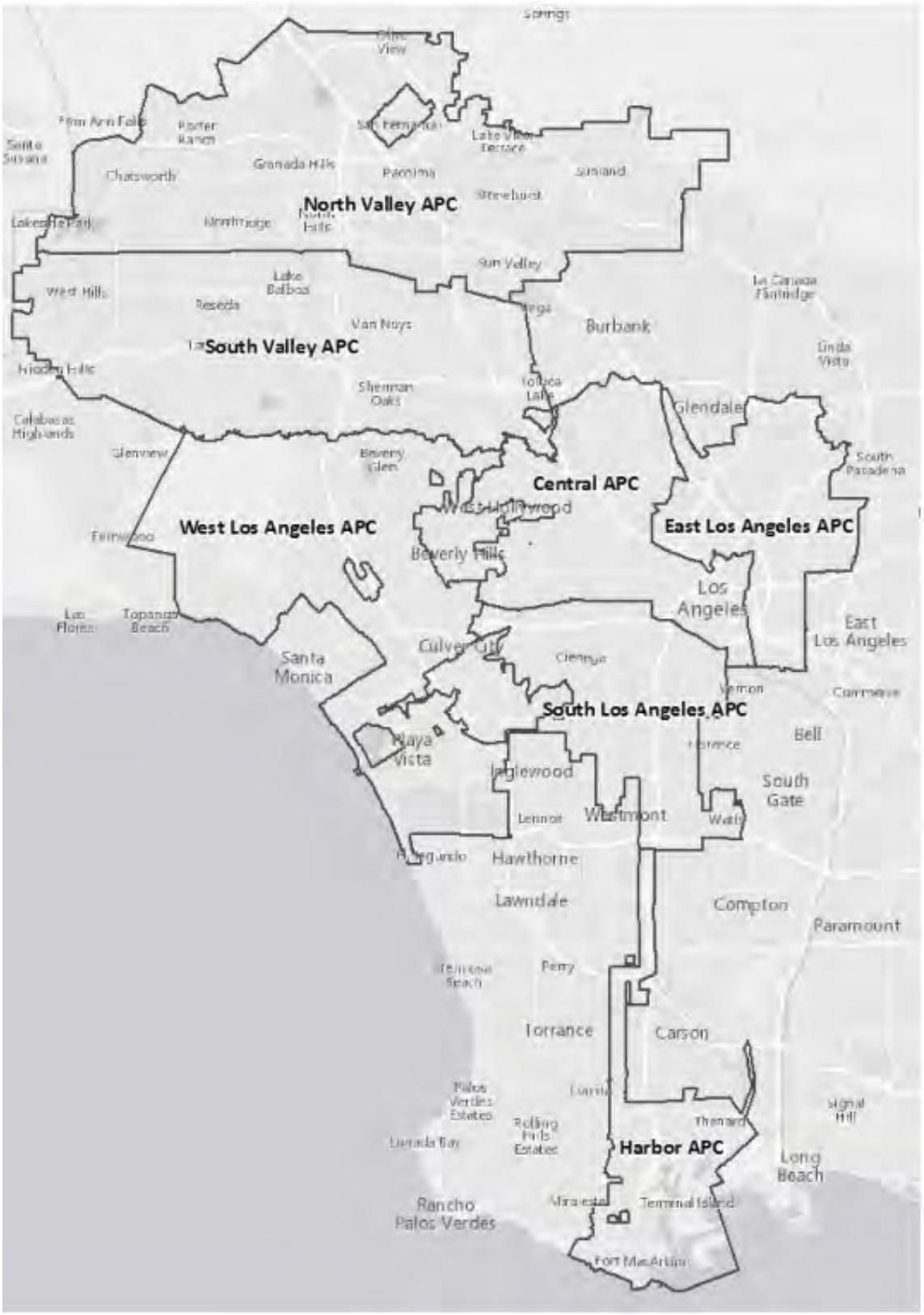
Table 3-2. Vehicle Miles Traveled Impact Criteria

Area Planning Commission	Daily Household VMT per Capita	Daily Work VMT per Employee
Central	6.0	7.6
East Los Angeles	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South Los Angeles	6.0	11.6
South Valley	9.4	11.6
West Los Angeles	7.4	11.1

Source: LADOT 2020

Notes:
VMT=Vehicle Miles Traveled

Figure 3-1. Area Planning Commission Boundaries in City of Los Angeles



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Automobile Travel – Transportation Project (Threshold T-2.2)

The project consists of transportation related improvements to enhance the rail capacity and passenger throughput of LAUS. These improvements are transit oriented and anticipated to reduce VMT and greenhouse gas emissions. Pursuant to CEQA Guidelines Section 15064.3(b)(2), "Transportation projects that reduce or have no impact on VMT, should be presumed to cause a less than significant transportation impact." Therefore, no short term VMT impacts would occur as a result of the project.

The project is also consistent with previously identified cumulative impacts because the project does not change the existing land use and would improve an existing transit facility identified in the SCAG RTP/SCS. The project would add additional rail and transit capacity to an existing transit facility. Therefore, the project is consistent with the SCAG RTP/SCS and no long term cumulative induced VMT impacts are expected.

3.1.5 Geometric Design (Threshold T-3)

The impacts regarding the potential increase in hazards due to the proposed geometric design feature generally relates to the design of access points to and from the project site and may include safety, operational, or capacity impacts. Impacts can be related to vehicle-vehicle, vehicle-bicycle, or vehicle-pedestrian conflicts. In general, these conflicts may be created due to the driveway configuration or through the placement of project driveways in areas of inadequate visibility, existing bicycle or pedestrian facilities or busy/congested intersections.

The project has four existing access points to the site including:

- Alameda Street Entrance
- Cesar Chavez Avenue Entrance
- Cesar Chavez Avenue/Vignes Street Entrance (for pedestrians only)
- Vignes Street Entrance

The project would not change the existing access points for Locations 1 through 4 in terms of design configuration, and, as such, would not result in a potential increase in hazards. The project would not result in any significant impacts pertaining to geometric design.

Freeway Safety

The Final EIR concluded that the project would not add 25 or more trips on any of the freeway off-ramp (US-101, I-5, I-110, I-10 and SR-60) within the vicinity of LAUS; therefore, no queueing analysis is warranted to determine potential queuing related impacts on freeway off-ramps. Therefore, the project would not result in any significant impacts on freeway access and safety.

Emergency Vehicle Access

The existing access points provide emergency access to LAUS. The Final EIR traffic analysis concluded that the amount of traffic generated by the project would not change the traffic operations at any of the signalized intersections in the vicinity of the project that provide direct access for emergency vehicles to the project site. Since the existing access points would not change as part of the project, no impacts on emergency vehicle access would occur. Therefore, similar to the Final EIR, the project would not result in any significant impacts on the emergency vehicle access to the project site.

3.2 Changes to the Mitigation Monitoring and Reporting Program

3.2.1 Background

As discussed on Page 3.2-7 of the Final EIR, Metro is authorized by the State of California to develop its property under its enabling legislation (Assembly Bill [AB] 152) and Public Utilities Code 30631a. Metro, as a rapid transit district, is exempt from the Building and Zoning Code requirements as long as the alteration and the use of the facility is in furtherance of the public purpose of Metro and not purely a revenue-generating venture. Based on the provisions of this exemption, and considering the concurrent and ongoing federal environmental review process that would require a more robust consultation process and ultimate approval from the SHPO, CEQA Addendum No. 1 includes updates to the text of three cultural resources mitigation measures and refinements to the implementation provisions of three additional cultural resources mitigation measures of the Final EIR MMRP, as follows:

- HIST-1a, HIST-1c, and HIST-4 - Updates to text of Mitigation Measures HIST-1a, HIST-1c, and HIST-4 would allow for the City of Los Angeles Office of Historic Resources (OHR) and City of Los Angeles Cultural Heritage Commission (CHC) to participate in the review of the alterations, demolition, and restoration plans for any locally designated resources that may be impacted by the project.

- HIST-1d, HIST-2, and HIST-3 – Refinements to the implementation provisions of Mitigation Measures HIST-1d, HIST-2, and HIST-3 would establish Metro as the enforcement agency during the compliance monitoring and reporting phase (Appendix B)

In addition, one hydrology and water quality mitigation measure of the Final EIR, HWQ-1, intended to regulate stormwater discharges, requires update to reflect a minor technical change to the risk level.

Lastly, one transportation and traffic mitigation measure of the Final EIR, TR-2, intended to alleviate impacts due to LOS delay, requires removal based on the results of the updated transportation analysis indicating no VMT impacts would occur.

Changes to these mitigation measures are either procedural or based on new information (i.e., VMT analysis results). Revisions to mitigation measures are minor, in-kind corrections and would not result in new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR. As such, revisions to these mitigation measures would not require preparation of a subsequent EIR.

3.2.2 Description

The changes to the text of the mitigation measures of the Final EIR, as analyzed herein as part of CEQA Addendum No. 1, are shown in strikeout/underline below. All updated mitigation measures, including any refinements to the implementation provisions are reflected in the updated MMRP provided as Appendix B.

HIST-1a LAUS City of Los Angeles CHC Review and Consultation: ~~Metro shall comply with the applicable Cultural Heritage Ordinance sections for LAUS as a Historic Cultural Monument by obtaining a Permit for Substantial Alteration and/or Permit for the Demolition or Relocation of a Site, Building or Structure Designated a Monument. Per Article 1, Section 22.171.14 of the City Cultural Heritage Ordinance, no person, owner or other entity shall demolish, alter, rehabilitate, develop, construct, restore, remove, or change the appearance of any Designated HCM without first having applied for and been granted a permit. The Director of Planning may refer a permit to the CHC when there is potential discrepancy between the proposal and the standards. The CHC may vote to object or not object to the issuance of a permit, for up to 180 days, with an additional 180 day extension to the objection period upon a vote of the City Council.~~ Based on LAUS being identified as City of Los Angeles Historic-Cultural Monument #101, Metro shall consult with the City of Los Angeles Office of Historic Resources (OHR) and CHC during early design phases of the project to discuss the character-defining features of LAUS that would be altered or demolished by the project. Metro shall take into consideration the feedback received from the OHR and CHC in progressing the design to completion.

HIST-1c LAUS Restoration of the Existing Passenger Concourse (west of pedestrian passageway): To ensure compatibility with the architecturally significant buildings that are part of LAUS and to mitigate the demolition or alteration of character-defining features at LAUS, the original passenger concourse shall be restored, where feasible, from an engineering and constructability standpoint, to its 1939 appearance in accordance with the Secretary of the Interior's Standards for Restoration. The original passenger concourse is a distinct transitional space between the waiting hall and the pedestrian passageway, having a low and flat ceiling with chamfered, rectangular columns with flared capitals. The original passenger concourse presently contains multiple retail spaces, restrooms, Amtrak ticketing and baggage handling, and the entrance to the subterranean Red and Purple subway lines. This includes possible redesign of the entrance to the Metro Red Line Subway to be more compatible with the historic LAUS design. Metro shall design and implement the restoration in

consultation with ~~and with approval from~~ the City of Los Angeles CHC and OHR prior to finalizing design.

HIST-4 **North Main Street Bridge City of Los Angeles CHC Review and Consultation:** Metro shall ensure that prior to construction, work proposed on all elements and character-defining features of the North Main Street Bridge, including, but not limited to, its sidewalks, decking, and wingwalls, shall follow the Secretary of Interior's Standards for the Treatment of Historic Properties, to the extent feasible. ~~The North Main Street Bridge is designated a LAHCM (#901). Pursuant to Article 1, Section 22.171.14 of the City Cultural Heritage Ordinance, no person, owner or other entity shall demolish, alter, rehabilitate, develop, construct, restore, remove, or change the appearance of the North Main Street Bridge without first having applied for and been granted a permit by the City of Los Angeles. The Director of Planning may refer a permit to the CHC when there is a potential discrepancy between the proposal and the standards. The commission may vote to object or not object to the issuance of a permit, for up to 180 days, with an additional 180-day extension to the objection period upon a vote of the City Council.~~ Based on the North Main Street Bridge being identified as City of Los Angeles Historic-Cultural Monument #901, Metro shall consult with the City of Los Angeles Office of Historic Resources (OHR) and CHC during early design phases of the project to discuss the character-defining features of the North Main Street Bridge that would be altered by the project. Metro shall take into consideration the feedback received from the OHR and CHC in progressing the design to completion.

In the Final EIR, Mitigation Measure HWQ-1 stated that the project was subject to Risk Level 1 sampling and reporting requirements under the construction general permit; however, subsequent to certification of the Final EIR, it was determined the U.S. EPA calculator was incorrectly computing the anticipated soil loss (R value or Revised Universal Soil Loss Equation) for the project. The 2009 CGP separates projects into Risk Levels 1, 2, and 3. Risk levels are determined during the planning and design phases and are based on the project schedule and potential erosion and transport to receiving waters. Requirements apply according to the risk level determined. For example, a Risk Level 3 (highest risk) project would require more robust sampling and reporting requirements than a Risk Level 1 project. Since project construction is expected to take a duration of 6 years (Final EIR Technical Appendix C, Page 1), Mitigation Measure HWQ-1 has been updated to reflect the project as being designated as Risk Level 2. This revision of the mitigation measure is considered a minor technical change, and the revised mitigation measure is shown below:

HWQ-1 **Prepare and Implement a Stormwater Pollution Prevention Plan (SWPPP):** During construction, Metro shall comply with the provisions of the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, NPDES No. CAS000002) and any subsequent amendments (Order No. 2010-0014-DWQ and Order No. 2012-0006-DWQ), as they relate to project construction activities. Construction activities shall not commence until a waste discharger identification number is received from the Stormwater Multiple Application and Report Tracking System. The contractor shall implement all required aspects of the SWPPP during project construction. Metro shall comply with the Risk Level ~~1~~ 2 sampling and reporting requirements of the construction general permit. A rain event action plan shall be prepared and implemented by a qualified SWPPP developer within 48 hours prior to a rain event of 50 percent or greater probability of precipitation according to the National Oceanic and Atmospheric Administration. A Notice of Termination shall be submitted to the State Water Resources Control Board (SWRCB) within 90 days of completion of construction and stabilization of the site.

As discussed above, unsatisfactory LOS causing delay, which was originally considered in the EIR, is no longer a significant impact under CEQA pursuant to SB 743 and Public Resources Code section 21099(b)(2). Metro prepared an updated transportation analysis based on the new CEQA Guidelines and LADOT's updated TAG. The updated transportation analysis shows that Mitigation Measure TR-2 is not required under CEQA because there are no VMT impacts; therefore, the mitigation measure has been removed from the Final EIR MMRP (Appendix B). Removal of Mitigation Measure TR-2 would not result in new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR. As such, removal of the mitigation measure would not require preparation of a subsequent EIR.

~~**TR-2** **Install Traffic Signal:** Metro shall install a new traffic signal at the intersection of Center Street and Commercial Street.~~

3.3 Project Modifications: Changes to Platform 2 and 3, Tracks 3 Through 6, and Associated Vertical Circulation Elements

3.3.1 Background

The Final EIR indicates Platforms 2 through 7 and the adjacent tracks would be constructed at the same elevation when the rail yard and concourse improvements are completed in the full build out condition (2031), and as early as 2033, after construction of the concourse and elevated rail yard is complete, Platforms 2 and 3 with their associated VCEs (stairs, escalators, and elevators) would be extended 3 feet higher to meet CHSRA's level-boarding requirements to operate HSR trains at LAUS. This is due to a 36-inch difference in floor heights from the track level between Metrolink/Amtrak trains and future HSR trains (higher floors on HSR trains). This approach, as

originally planned, would require rework of the elevated rail yard including partial reconstruction of Platforms 2 and 3 and the associated VCEs, thereby resulting in potential impacts to train operations and interruption of regional/intercity rail service for passengers to accommodate construction of the planned HSR system after the concourse and elevated rail yard is complete as part of the Link US project.

3.3.2 Description

Metro, in coordination with CHSRA, SCRRA and California State Transportation Agency (CalSTA), is proposing to construct Platforms 2 and 3 to their ultimate planned elevation, thereby eliminating the need to raise and reconstruct the two platforms and associated VCEs at a later date to accommodate the planned HSR system at LAUS. The refined design approach for Platforms 2 and 3 and the adjacent tracks (Tracks 3 through 6) would allow for the platforms and associated VCEs to be constructed to their ultimate planned elevation when the rail yard is elevated as early as 2031 and would require lowering of the adjacent tracks at a later date as early as 2033 upon implementation of the planned HSR system. In this refined approach, lowering of Tracks 3 through 6, instead of raising platforms and extending VCEs, is a cost savings measure that would also reduce impacts to train operations and service interruptions since Platforms 2 and 3 and the associated VCEs would not need to be modified in the future for HSR operations.

- As depicted in Figure 3-2, in the full build-out condition as early as 2031, Platforms 2 and 3 (and their associated VCEs) would be constructed 36-inches or 3 feet higher than Platforms 4, 5, 6 and 7 to accommodate the level boarding requirements for future HSR trains. The adjacent tracks serving Platforms 2 and 3 (Tracks 3 through 6) would be constructed at an elevation of 312 above mean sea level (AMSL), and Tracks 7 through 14 serving Platforms 4, 5, 6, and 7 would be constructed at an elevation of 309 AMSL (36-inches or 3 feet higher). Additional retaining walls between Tracks 2 and 3 and between Tracks 6 and 7 are also proposed in the full build-out condition (as early as 2031) to accommodate the required track lowering in the full build-out condition with HSR (as early as 2033) with the intent of minimizing impacts to train operations.

- As depicted in Figure 3-3, during the full build-out condition with HSR (as early as 2033), Tracks 3 through 6 would be lowered by 3 feet in elevation. Approximately 1,300 linear feet of each track from Tracks 3 through 6 would be lowered to accommodate the planned HSR system. It should be noted that Tracks 3 through 6 and Platforms 2 and 3 are available for use by regional/intercity trains if high-level train vehicles are used in the future.

The location of Platforms 2 and 3 where the Project modifications would occur is depicted on Figure 3-2 and Figure 3-3. Figure 3-4 shows the approximate locations of the raised VCEs on Platforms 2 and 3.

Figure 3-2. Cross Section of Rail Yard (Full Build-Out Condition) – Looking South

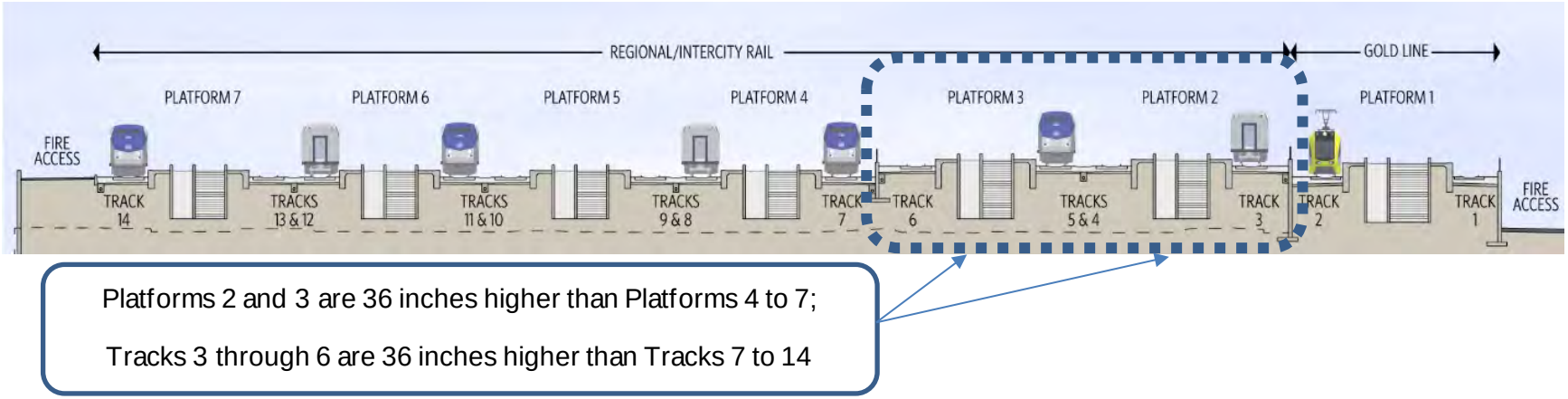

Figure 3-3. Cross Section of Rail Yard (Full Build-Out with High-Speed Rail Condition) – Looking South

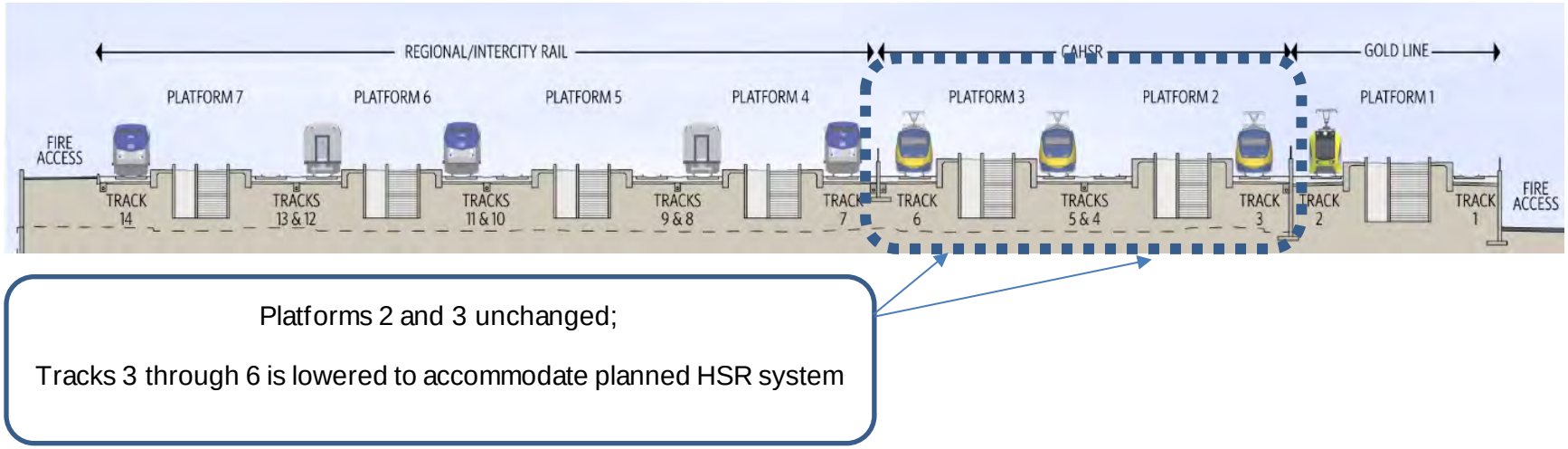

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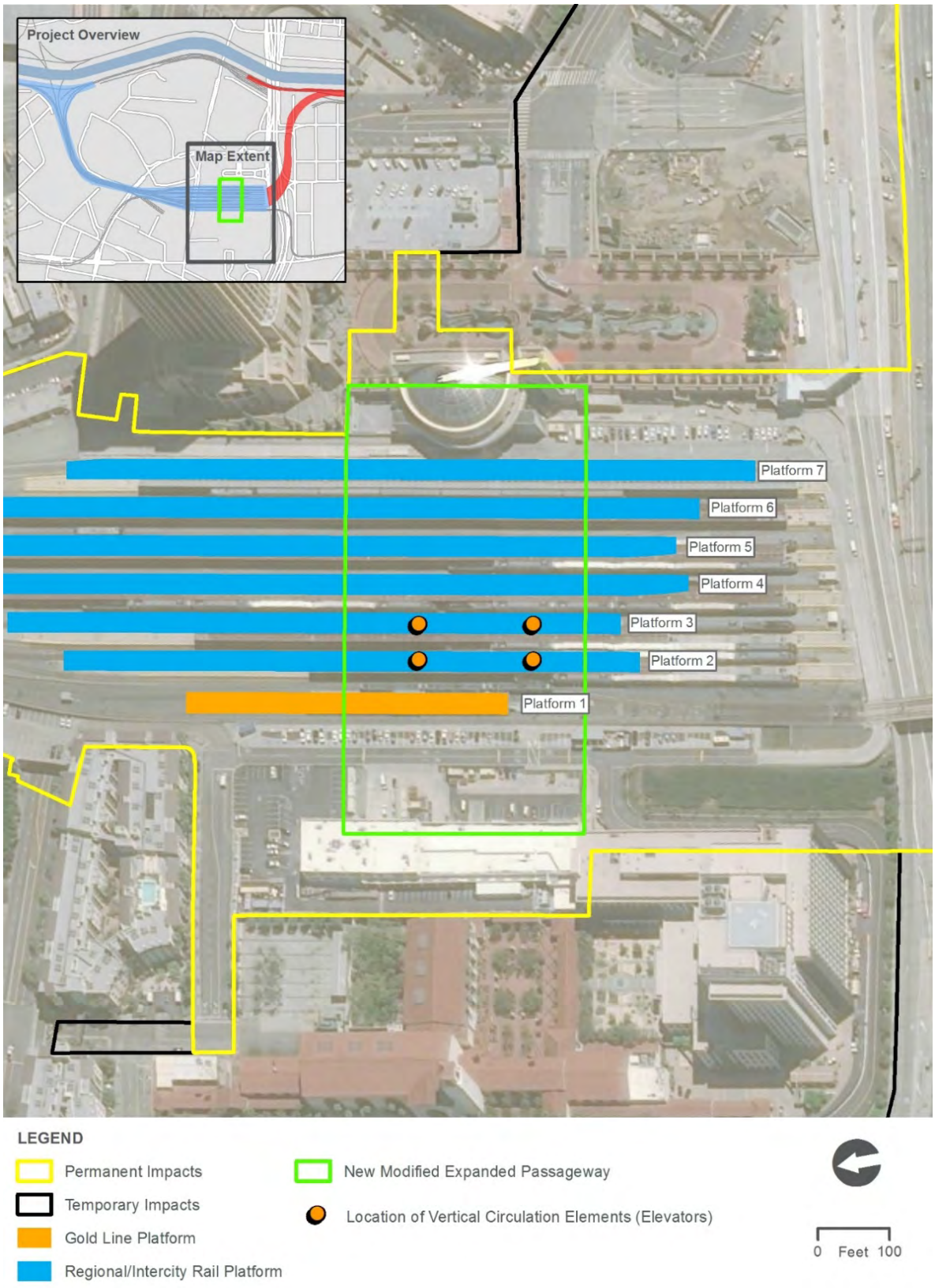
Figure 3-4. Raised Vertical Circulation Element Locations



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4.0 Analysis

This section includes an analysis of each of the environmental topics addressed in the certified Final EIR and focuses on the potential changes in environmental impacts due to updated transportation analysis, changes to the Final EIR MMRP, and project modifications outlined above. Specifically, the evaluation of each environmental topic discusses the potential physical effects of the following:

- Updated Transportation Analysis – Application of updated impact assessment methodology to address potential increased VMT instead of LOS delay
- Changes to Approved Mitigation Monitoring and Reporting Program - Adjustment to seven measures to modify the responsible party and correct a typo, and removal of one measure that no longer applies based on updated transportation analysis results (Mitigation Measures HIST-1a, HIST-1c, HIST-1d, HIST-2, HIST-3, HIST-4, HWQ-1, and TR-2)
- Project Modifications – Changes to Platforms 2 and 3 and associated vertical circulation elements

Each evaluation includes a conclusion of the impacts that may result upon implementation of the updated transportation analysis, changes to the approved Final EIR MMRP, and project modifications. As stated in Section 1.2, this environmental evaluation as part of CEQA Addendum No. 1 is intended to provide documentation to support the conclusions that none of the conditions specified in CEQA Guidelines Section 15162 exist. The evaluation specifically demonstrates how, based on substantial evidence, the updated transportation analysis, changes to the approved Final EIR MMRP, and project modifications do not result in new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR. As presented below, the conclusions of the Final EIR certified by the Metro Board of Directors in June 2019 remain accurate and applicable to the updated transportation analyses, changes to the approved Final EIR MMRP, and project modifications.

4.1 Environmental Topics Requiring No Further Evaluation

The following environmental topics, which were previously analyzed in the Final EIR, have been determined to require no further evaluation in CEQA Addendum No. 1 because the updated transportation analyses, changes to the Final EIR MMRP, and proposed project modifications are not applicable to these resource topic areas. Two of the three components addressed in this CEQA Addendum No. 1 are policy-related (updated transportation analysis and changes to the Final EIR MMRP), with no physical modifications to proposed infrastructure that would result in potential environmental impacts. As such, the impact analyses and conclusions drawn in the Final EIR would remain unchanged upon implementation of the project modifications for the reasons described below:

- Biological Resources - No new physical construction or grading would occur in areas beyond those considered in the Final EIR. The project modifications would occur within an urban environment with no vegetation (LAUS rail yard), proposed modifications are similar to what as previously considered in the Final EIR, and project modifications would have no direct or indirect impacts on special status species, wildlife movement, or local policies/ordinances during construction or operation.
- Geology and Soils/Hazards and Hazardous Materials/Hydrology and Water Quality - All project-related infrastructure would be designed and constructed in accordance with standard engineering practices and standard safety protocols, in accordance with Occupational Safety and Health Administration requirements and local, state, and federal regulations to minimize potential for impacts related to geology and soils, hazards and hazardous materials, utilities/service systems, and hydrology and water quality.
- Utilities and Service Systems/Public Services - No increased demand on local utilities and service systems or public services would occur, and new conflicts with emergency service providers throughout the project study area is not expected to occur.
- Noise and Vibration - No new receptors would be subject to potential noise and vibration impacts and construction-related noise levels would be similar to the levels as described in the Final EIR.

With implementation of the resource-specific mitigation measures identified in the Final EIR, impacts on biological resources; geology and soils; hazards and hazardous materials; utilities and service systems; noise and vibration, hydrology and water quality, and public services would remain the same as those identified in the Final EIR. As such, the Final EIR adequately addresses potential impacts on these environmental topic areas considered under CEQA. No further analysis of potential impacts associated with the updated transportation analyses, changes to the approved Final EIR MMRP, and proposed project modifications is required.

4.2 Land Use and Planning

4.2.1 Analysis of Updated Transportation Analysis, Changes to Mitigation Monitoring and Reporting Program, and Project Modifications

Impacts related to land use and planning were evaluated based on potential alterations to land use patterns that could result in a physical division of an established community, or if the updated transportation analysis, changes to the Final EIR MMRP, or project modifications would result in new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR due to a conflict with an applicable land use plan, policy, or regulation.

Updated Transportation Analysis

Pursuant to the 2019 CEQA Guidelines Appendix G environmental checklist and Threshold T-1 of the Impact Criteria outlined in Section 2 of LADOTs updated TAG, an analysis was conducted to determine consistency with major adopted City plans, programs, ordinances, and policies that specifically address the circulation system, including transit, roadways, bicycle, and pedestrian facilities (Appendix A). The key plans, programs, ordinances, and policies reviewed as part of the updated transportation analysis focus on the on the safety and performance of the transportation system. Based on the updated transportation analysis, the project is consistent with all listed plans, programs, ordinances, and policies.

The consistency analysis performed to address the VMT analysis requirements would not change the previously identified significant impact related to the conflict with Policy 2.12 of the *Mobility Plan 2035.* This is because CEQA Addendum No. 1 does not include any changes to the project to promote neighborhood sustainability, connectivity, and non-motorized connections from LAUS to the Los Angeles River. The significant impact would remain, and Mitigation Measure LU-1 would remain applicable to reduce impacts to a level less than significant.

Therefore, no new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR would occur, and the conclusions of the Final EIR remain accurate and applicable to the updated transportation analysis.

Changes to Mitigation Monitoring and Reporting Program

Changes to the mitigation measures contained in the Final EIR MMRP listed above would not result in any changes to existing land use analysis or previously identified land use impacts associated with the project, nor would it substantively change the effectiveness of the mitigation. The changes to the mitigation measures are not related to the Final EIR land use analysis.

Therefore, no new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR would occur, and the conclusions of the Final EIR remain accurate and applicable to the changes to the Final EIR MMRP.

Project Modifications

The project modifications that would occur at Platforms 2 and 3 would not result in any changes to existing land use analysis or previously identified land use impacts associated with the project, nor would it significantly modify the scope and intent of the mitigation. Consistent with the Final EIR, Platforms 2 and 3, Tracks 3 through 6, and associated VCEs would still be constructed at the same location; except that these project elements would be constructed three feet higher in elevation than originally anticipated in the Final EIR. Improvements associated with Platforms 2 and 3 are located entirely within the LAUS rail yard and within the project footprint evaluated as part of the Final EIR. Therefore, no new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR would occur, and the conclusions of the Final EIR remain accurate and applicable to the project modifications.

Conclusion

Pursuant to the provisions of the Final EIR MMRP, Mitigation Measure LU-1 would be implemented to reduce previously identified significant impacts related to land use and planning. The updated transportation analysis, changes to the Final EIR MMRP, and project modifications would not result in new significant impacts, or a substantial increase in the severity of impacts related to land use and planning beyond those previously identified in the Final EIR. The impact conclusions in the Final EIR remain unchanged.

4.3 Transportation and Traffic

4.3.1 Analysis of Updated Transportation Analysis, Changes to Mitigation Monitoring and Reporting Program, and Project Modifications

The changes to the Final EIR MMRP and project modifications were evaluated to determine if there is a potential for transportation related impact. As it relates to the updated transportation analysis, the evaluation focuses on the new state and local VMT analysis requirements. As discussed above, the updated transportation analysis replaces the existing LOS analysis in the Final EIR; as presented in Section 3.3, Transportation and Traffic (under Threshold A only), Table 2-1, Appendix P, and Chapter 10 of the Final EIR.

Updated Transportation Analysis

Based on LADOTs updated TAG, the project was analyzed pursuant to the CEQA transportation analysis thresholds below:

- Consistency with local plans, programs, ordinances, or policies that specifically focus on the safety and performance of the transportation system including transit, roadways, bicycle, and pedestrian facilities (LADOTs updated TAG Threshold T-1),

- Cause for any substantial VMT impacts associated with the land use development (retail/office/commercial space) proposed at LAUS (LADOTs updated TAG Threshold T-2.1),
- If the capital improvements associated with the transportation component of the project would substantially induce additional automobile travel (LADOTs updated TAG Threshold T-2.2),
- If geometric design features or incompatible uses would substantially increase hazards (LADOTs updated TAG Threshold T-3)

Based on the results of the updated CEQA transportation analysis performed in accordance with LADOTs updated TAG (summarized below), no new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR would occur.

LADOT Updated TAG Threshold T-1 – Conflicting with Plans, Programs, Ordinances, or Policies

The project is consistent with the City's adopted plans, programs, ordinances, and policies that address safety and performance of the transportation system. Because the project is consistent with the City's adopted plans, programs, ordinances, and policies, no significant impact would occur.

LADOT Updated TAG Threshold T-2.1 – Causing Substantial Vehicles Miles Traveled

- Short Term VMT Impacts: The updated transportation analysis addresses the 160,000 square feet of new retail and food service area and 30,400 square feet of new office space that was part of the new modified expanded passageway (Final EIR project). The project would not result in the addition of any new parking to the LAUS campus. Any employee travel via automobile to/from the LAUS campus would result in vehicles parking in the existing parking supply at LAUS in which a fee is charged to park. Using LADOTs VMT calculator, the trip generating elements of the project would generate VMT per employee of 7.4, which is below the significant impact threshold of 7.6 for new development within the Central Area Planning Commission zone. Therefore, no short-term significant impacts would occur.
- Cumulative VMT Impacts: The major components of the project have not changed since certification of the Final EIR. Since the project would not create an unmitigated significant VMT impact (see short term VMT analysis results above) and would result in an improvement to an existing transit facility, which is already consistent with the SCAG RTP/SCS designation for LAUS, no cumulative VMT impacts would occur.

LADOT Updated TAG Threshold T-2.2 – Substantially Inducing Additional Automobile Travel

- Short Term VMT Impacts: Consistent with the results of the Final EIR, the project would contribute to a reduction of regional VMT and GHG emissions since the proposed

improvements are transit oriented (Final EIR Page 3.3-58). Hence, the project would have no short-term impacts.

- Cumulative VMT Impacts: Consistent with the results of the Final EIR, the project is consistent with the SCAG RTP/SCS, would add new rail and transit capacity, and no cumulative VMT impacts would occur.

As the project would not result in impacts resulting from short term or cumulative increases in VMT, in accordance with LADOTs updated TAG, quantification of reduced VMT was not warranted.

LADOT Updated TAG Threshold T-3 – Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use

Consistent with the Final EIR analysis for Threshold 3.3-D, no impacts related to geometric design features or incompatible uses would occur. Additionally, no impact on long-term emergency vehicle access to LAUS or the safety of the off ramps of nearby freeways would occur.

Changes to Mitigation Monitoring and Reporting Program

Pursuant to the requirements of Section 15064.3 of the California Code of Regulations and LADOTs updated TAG, a project's effect on automobile delay is no longer considered a significant environmental impact under CEQA. Therefore, based on the results of the updated transportation analysis, Mitigation Measure TR-2 of the Final EIR is no longer required to mitigate LOS impacts resulting from traffic delay at the Commercial Street and Center Street intersection. Removal of Mitigation Measure TR-2 from the Final EIR MMRP would not change other previously identified impacts (i.e., construction or transit-related impacts) or conclusions of the Final EIR related to traffic or transportation, nor would it substantively change the effectiveness of the mitigation. The changes to the mitigation measures for cultural resources and water quality contained in the Final EIR MMRP listed above do not affect the existing traffic and transportation analysis.

One less significant impact resulting from LOS delay would also require one less corresponding mitigation measure to be implemented than what was previously disclosed in the Final EIR. Therefore, the conclusions identified in the previously certified Final EIR (Table II) reflect one less significant impact. No new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR would occur, and the conclusions of the Final EIR remain accurate and applicable to the changes to the Final EIR MMRP.

Project Modifications

Project modifications would occur within the limits of the LAUS rail yard and would not result in any greater traffic or transportation impacts than what was evaluated in the Final EIR. Construction of the platforms and tracks (i.e., project modifications) would occur in a very similar manner as the work previously proposed in the rail yard area and as evaluated in the Final EIR. Therefore, no new significant impacts, or a substantial increase in the severity of impacts beyond

those previously identified in the Final EIR would occur, and the conclusions of the Final EIR remain accurate and applicable to the project modifications.

Conclusion

Pursuant to the provisions of the Final EIR MMRP, Mitigation Measure TR-1 and TR-3 would be implemented to reduce previously identified significant impacts related to land use and planning. The updated transportation analysis, changes to the Final EIR MMRP, and project modifications would not result in new significant impacts, or a substantial increase in the severity of impacts related to traffic and transportation beyond those previously identified in the Final EIR. As discussed above, Unsatisfactory LOS causing delay is no longer considered a significant impact under CEQA, pursuant to SB 743 and Public Resources Code section 21099(b)(2). Therefore, one less significant impact would occur under CEQA (No LOS operational impact under Threshold A), and the updated VMT analysis shows that Mitigation Measure TR-2 is no longer required. Based on the results of the updated transportation analysis, Mitigation Measure TR-2 is removed from the approved Final EIR MMRP (see Appendix B).

4.4 Aesthetics

4.4.1 Analysis of Updated Transportation Analysis, Changes to Mitigation Monitoring and Reporting Program, and Project Modifications

The updated transportation analysis, changes to the Final EIR MMRP, and project modifications were evaluated by considering the existing landscape constraints (landform and land cover) and identifying the visual elements of the project that could change from what was considered in the Final EIR.

Updated Transportation Analysis

The results of the updated transportation analysis would not change previously identified impacts or conclusions of the Final EIR related to aesthetics, nor would it substantively change the effectiveness of the mitigation. The depiction of active transportation improvements along Commercial Street in Chapter 10 of the Final EIR (Figures 10-19 and 10-20) would remain applicable because Mitigation Measure LU-1 is still required to reduce land use impacts. Therefore, no new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR would occur, and the conclusions of the Final EIR remain accurate and applicable to the updated transportation analysis.

Changes to Mitigation Monitoring and Reporting Program

Changes to the mitigation measures contained in the Final EIR MMRP listed above would not change previously identified impacts or conclusions of the Final EIR related to aesthetics, nor would it substantively change the effectiveness of the mitigation. The changes to the mitigation

measures are not related to the existing aesthetics analysis. Therefore, no new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR would occur, and the conclusions identified in the Final EIR remain accurate and applicable to the changes to the Final EIR MMRP.

Project Modifications

Improvements associated with the extended VCEs and raised platforms and associated tracks are in the same area as identified in the previously certified Final EIR. Within the rail yard, two of seven platforms would be constructed three feet higher, although the difference in elevation would not be noticeable to a point that would trigger any changes to the analysis for Visual Assessment Unit #6 (LAUS concourse area). Therefore, no new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR would occur, and the conclusions of the Final EIR remain accurate and applicable to the project modifications.

Conclusion

Pursuant to the provisions of the Final EIR MMRP, Mitigation Measures AES-1, AES-2, AES-3 would be implemented to reduce previously identified significant impacts related to aesthetics. The updated transportation analysis, changes to the Final EIR MMRP, and project modifications would not result in new significant impacts, or a substantial increase in the severity of impacts related to aesthetics beyond those previously identified in the Final EIR. The impact conclusions in the Final EIR remain unchanged.

4.5 Air Quality and Global Climate Change

4.5.1 Analysis of Updated Transportation Analysis, Changes to Mitigation Monitoring and Reporting Program, and Project Modifications

The updated transportation analysis, changes to the Final EIR MMRP, project modifications were evaluated by considering the potential for changes in truck trips, construction phasing, or the duration of construction, or potential changes to the amount of train trips that would occur through LAUS that would change the previously estimated level of daily construction and operational emissions of pollutants from what was considered in the Final EIR.

Updated Transportation Analysis

The impact analysis for air quality and global climate change in the Final EIR is based on the estimated emissions from truck trips based on the anticipated construction phasing scenario and duration of construction (construction), and the increase in train trips through LAUS (operations). Due to increased operational capacity of LAUS, other project-related cumulative benefits for the region were also acknowledged in the Final EIR, along with a qualitative evaluation of the regional reduction of GHG emissions and VMT that would offset the increased emissions in 2026, 2031,

and 2040. The results of the updated transportation analysis indicate the project would be consistent with the RTP/SCS and there would be no impacts resulting from short term or cumulative increases in VMT. Based on these results, and in accordance with LADOTs updated TAG, further quantification of reduced VMT is not warranted.

The construction assumptions (phasing scenario and duration) and increased rail operations discussed above apply equally to the updated transportation analysis and the existing transportation analysis in the Final EIR. For this reason, the related air quality and global climate change results would not change by using a different traffic impact analysis methodology. Therefore, no new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR would occur, and the conclusions of the Final EIR remain accurate and applicable to the updated transportation analysis.

Changes to Mitigation Monitoring and Reporting Program

Changes to the mitigation measures contained in the Final EIR MMRP listed above would not result in any changes to existing air quality and global climate change impacts or conclusions of the Final EIR related to air quality and global climate change, nor would it substantively change the effectiveness of the mitigation. The changes to the mitigation measures are not related to the existing air quality analysis. Therefore, no new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR would occur, and the conclusions of the Final EIR remain accurate and applicable to the changes reflected in the Final EIR MMRP.

Project Modifications

Project modifications would occur within the limits of the LAUS rail yard and would not result in any greater air quality impacts than what was already considered in the Final EIR because changes in emissions would be negligible, given the extent of proposed modifications to Platform 2 and 3 and the conservative level of impact analysis presented in the Final EIR. Construction of the platforms and tracks as described in CEQA Addendum No. 1 would occur in a very similar manner as the work previously evaluated in the rail yard area and the same air quality benefits would be realized as identified in the Final EIR. Therefore, no new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR would occur, and the conclusions of the Final EIR remain accurate and applicable to the project modifications.

Conclusion

Pursuant to the provisions of the Final EIR MMRP, Mitigation Measures AQ-1, AQ-2, and AQ-3 would be implemented to reduce previously identified significant impacts related to air quality and global climate change. The updated transportation analysis, changes to the Final EIR MMRP, and project modifications would not result in new significant impacts, or a substantial increase in the severity of impacts related to air quality and global climate change beyond those previously identified in the Final EIR. The impact conclusions in the Final EIR remain unchanged.

4.6 Cultural Resources

4.6.1 Analysis of Updated Transportation Analysis, Changes to Mitigation Monitoring and Reporting Program, and Project Modifications

The updated transportation analysis, changes to the Final EIR MMRP, and project modifications were evaluated by considering the extent of changes to historical resources (including any changes to character defining features), unique archaeological sites, or Tribal Cultural Resources that may occur and to identify the potential impacts on cultural, historical, tribal, and paleontological resources that could change from what was considered in the Final EIR.

Updated Transportation Analysis

Based on the results of the updated transportation analysis, the traffic signal required as part of Mitigation Measure TR-2 is no longer needed to reduce significant impacts from LOS delay under CEQA. Therefore, reduced ground-disturbing construction activities would occur in areas known to contain Archaeological Site CA-LAN-1575/H and in areas that may contain previously undiscovered prehistoric and historical archaeological features or sites. The amount of excavation would be reduced because the updated transportation analysis demonstrates a traffic signal is not required to reduce traffic impacts, thereby reducing potential impacts on sensitive archeological and paleontological resources from what was considered in the Final EIR. Therefore, no new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR would occur, and the conclusions of the Final EIR remain accurate and applicable to the updated transportation analysis.

Changes to Mitigation Monitoring and Reporting Program

Changes to the cultural resources mitigation measures contained in the Final EIR MMRP mentioned above would allow for the City of Los Angeles Office of Historic Resources (OHR) and City of Los Angeles Cultural Heritage Commission (CHC) to participate in the review of alteration, demolition, and restoration plans for any locally designated historic resources that may be impacted by the project, and establish Metro as the responsible enforcement agency during the compliance monitoring and reporting phase. Metro is committed to continued coordination with these entities and would be consulting with these two parties during final design (and during the NEPA process) to avoid/reduce impacts on cultural resources. It should be noted the same resources acknowledged in Mitigation Measures HIST-1a, HIST-1c, and HIST-4 (LAUS and North Main Street Bridge), would be subject to a similar level of review by the SHPO and consulting parties and protection under the NRHP. During the upcoming SHPO review process in support of the NEPA process, a robust review and consultation process would occur for these resources, and OHR and CHC would have ability to provide feedback and insight on the resources, as designated consulting parties. Therefore, no new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR would occur, and the

conclusions of the Final EIR remain accurate and applicable to the changes to the Final EIR MMRP.

Project Modifications

The extended VCEs and raised platforms and associated tracks in the rail yard would occur in the same area of direct impact with similar cultural and paleontological resource sensitivity as identified in the Final EIR. No new properties would be affected and no changes to the depth of disturbance would occur beyond what was considered in the Final EIR. Within the rail yard, two of seven platforms would be constructed three feet higher, although the difference in elevation would not be noticeable to a point that would trigger any changes to the analysis for potential direct or indirect impacts on cultural, historical, tribal, and paleontological resources evaluated in the Final EIR, including LAUS. Therefore, no new significant impacts, or a substantial increase in the severity of impacts beyond those previously identified in the Final EIR would occur, and the conclusions of the Final EIR remain accurate and applicable to the project modifications.

Conclusion

Pursuant to the provisions of the Final EIR MMRP, Mitigation Measures HIST-1a (revised), HIST-1b, HIST-1c (revised), HIST-1d (revised), HIST-2 (revised), HIST-3 (revised), HIST-4 (revised), HIST-5, HIST-6, PAL-1, PAL-2, and PAL-3 would be implemented to reduce previously identified significant impacts related to cultural resources. The updated transportation analysis, changes to the approved Final EIR MMRP, and project modifications would not result in new significant impacts, or a substantial increase in the severity of impacts related to cultural resources beyond those previously identified in the Final EIR. The impact conclusions in the Final EIR remain unchanged.

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5.0 Conclusion

Based on the findings and information contained in the Final EIR, the analysis above, the CEQA statute and CEQA Guidelines, including Sections 15164 and 15162, the updated transportation analysis, changes to the Final EIR MMRP, and project modifications will not result in any new significant impacts, or a substantial increase in the severity of impacts previously considered and addressed in the Final EIR.

A Supplemental EIR is not required because the updated transportation analysis, project modifications, and changes to the Final EIR MMRP considered in CEQA Addendum No. 1:

- Do not include substantial changes thereby requiring major revisions to the Final EIR;
- Do not include substantial changes with respect to the circumstances under which the project would be undertaken thereby requiring major revisions to the Final EIR;
- Do not include new information of substantial importance that shows:
  - one or more new significant environmental effects would occur
  - a substantial increase in the severity of previously identified significant effects would occur
  - mitigation measures or alternatives previously found not to be feasible would be feasible or substantially reduce one or more significant effects, but Metro is declining to adopt the mitigation measure or alternative
  - mitigation measures or alternatives which are considerably different from those analyzed in the Final EIR would substantially reduce one or more significant effects on the environment, but Metro is declining to adopt the mitigation measure or alternative

As discussed in Section 2.0 and demonstrated by the analysis in Section 4.0, CEQA Addendum No. 1 to the Final EIR is the appropriate environmental documentation for the updated transportation analysis, changes to the Final EIR MMRP, and project modifications because none of the instances above would occur.

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6.0 References

California Department of Transportation (Caltrans). 2016. *2040 California Transportation Plan*. http://www.dot.ca.gov/hq/tpp/californiatransportationplan2040/Final%20CTP/FINALCTP2040-Report-WebReady.pdf

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Appendix A. Link US Project Traffic Impact Assessment with Vehicle Miles Traveled Analysis

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Traffic Impact Assessment with Vehicle Miles Traveled Analysis

Link Union Station

October 2021

Prepared for:

Metro

Prepared by:

HDR

Gibson transportation consulting, inc.

The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by the State of California pursuant to 23 U.S.C. 327 and a Memorandum of Understanding dated July 23, 2019, and executed by the Federal Railroad Administration and the State of California.

Link US

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APPENDICES

ACRONYMS

CEQA	California Environmental Quality Act
EIR	Environmental Impact Report
GHG	greenhouse gas
LADOT	Los Angeles Department of Transportation
LAMC	Los Angeles Municipal Code
LAUS	Los Angeles Union Station
Metro	Los Angeles County Metropolitan Transportation Authority
Project	Link Union Station Project
ROW	right-of-way
RTP	Regional Transportation Plan
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
TAG	Transportation Assessment Guidelines
US-101	United States Highway 101
VMT	vehicle miles traveled

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1.0 Introduction

The Los Angeles County Metropolitan Transportation Authority (Metro) is proposing the Link Union Station Project (Project) to transform Los Angeles Union Station (LAUS) from a "stub-end tracks station" into a "run-through tracks station" with a new passenger concourse that would improve the efficiency of the station and accommodate future growth and transportation demands in the region. The construction of the Project is scheduled to begin as early as 2022.

The Final Environmental Impact Report (EIR) along with the Traffic Impact Assessment Report for this Project was approved by the City of Los Angeles in June 2019 (Metro 2019). The traffic impact analysis in the Final EIR was conducted as per Los Angeles Department of Transportation's (LADOT) *Transportation Impact Study Guidelines, December 2016*. In July 2020, the City of Los Angeles' Transportation Assessment Guidelines (TAG) were updated (LADOT 2020) to be consistent with Senate Bill 743, which was approved in 2013 and would change the evaluation of traffic impacts of a proposed project from level of service to vehicle miles traveled (VMT). As part of the updated TAG, the City of Los Angeles developed new methodologies and criteria for implementing the VMT analyses for new development projects. Based on discussions with City of Los Angeles and other stakeholders, Metro prepared this VMT analysis to address the requirements of Senate Bill 743 and LADOT's updated TAG. The results of the analysis will be incorporated into a California Environmental Quality Act (CEQA) Addendum to the Final EIR for the Project.

1.1 Project Location and Study Area

LAUS is located at 800 Alameda Street in the City of Los Angeles, California. LAUS is bounded by United States Highway 101 (US-101) to the south, Alameda Street to the west, Cesar Chavez Avenue to the north, and Vignes Street to the east. Figure 1-1 depicts the regional location and general vicinity of LAUS.

Figure 1-2 depicts the Project study area, which encompasses the extent of environmental study associated with potential direct, indirect, and cumulative impacts from implementation of the Project. The Project study area includes three main segments (Segment 1: Throat Segment, Segment 2: Concourse Segment, and Segment 3: Run-Through Segment). The existing conditions within each segment are summarized north to south below.

- **Segment 1: Throat Segment** – This segment, known as the LAUS throat, includes the area north of the platforms at the LAUS rail yard, from Main Street at the north to Cesar Chavez Avenue at the south. In the throat segment, all arriving and departing trains are required to traverse through the LAUS throat, which includes a complex network of lead tracks, switches, and crossovers. Five lead tracks provide access into and out of the rail yard, except for one location near the Vignes Street Bridge, where it reduces to four lead tracks. Special track work consisting of multiple turnouts and double-slip switches are used in the throat to direct trains into and out of the appropriate assigned terminal platform

tracks. Land uses in the vicinity of the throat segment are residential, industrial, and institutional.

- **Segment 2: Concourse Segment** – This segment is between Cesar Chavez Avenue and US-101 and includes LAUS, the rail yard, the Garden Tracks (stub-end tracks where private train cars are currently stored, just north of the platforms and adjacent to the existing Gold Line aerial guideway), the East Portal Building, the baggage handling building with associated parking areas and access roads, the ticketing/waiting halls, and the 28-foot-wide pedestrian passageway with connecting ramps and stairways below the rail yard. Land uses in the vicinity of the concourse segment are residential, commercial, and public.
- **Segment 3: Run-Through Segment** – This segment is south of LAUS and extends east to west from Alameda Street to the west bank of the Los Angeles River and north to south from Keller Yard to Control Point Olympic. This segment includes US-101, the Commercial Street/Ducommun Street corridor, Metro Red and Purple Lines Maintenance Yard (Division 20 Rail Yard), BNSF West Bank Yard, Keller Yard, the main line tracks on the west bank of the Los Angeles River from Keller Yard to Control Point Olympic, and the Amtrak lead track connecting the main line tracks with Amtrak's Los Angeles Maintenance Facility in the vicinity of 8th Street. Land uses in the vicinity of the run-through segment are primarily industrial and manufacturing.

The Project study area has a dense street network ranging from major highways to local city streets. The roadways within the Project study area include the El Monte Busway, US-101, Bolero Lane, Leroy Street, Bloom Street, Cesar Chavez Avenue, Commercial Street, Ducommun Street, Jackson Street, Temple Street, Banning Street, 1st Street Yard, Alameda Street, Garey Street, Vignes Street, Main Street, Aliso Street, Avila Street, Bauchet Street, and Center Street.

1.2 Proposed Project Overview

The key components associated with the proposed Project components are summarized north to south below.

- **Segment 1: Throat Segment (lead tracks and throat track reconstruction)** – The proposed Project includes subgrade and structural improvements in Segment 1 of the Project study area (throat segment) to increase the elevation of the tracks leading to the rail yard. The proposed Project includes the addition of one new lead track in the throat segment for a total of six lead tracks to facilitate enhanced operations for regional/intercity rail trains (Metrolink/Amtrak) and new operations for high-speed rail trains within a shared track alignment. Regional/intercity and high-speed rail trains would share the two western lead tracks in the throat segment. The existing railroad bridges in the throat segment at Vignes Street and Cesar Chavez Avenue would also be reconstructed. North of Control Point Chavez on the west bank of the Los Angeles River, the proposed Project also includes safety improvements at the Main Street public at-grade railroad crossing

(medians, restriping, signals, and pedestrian and vehicular gate systems) to facilitate future implementation of a quiet zone by the City of Los Angeles.

- **Segment 2: Concourse Segment (elevated rail yard and expanded passageway)** – The proposed Project includes an elevated rail yard and expansion of the existing 28-foot-wide pedestrian passageway in Segment 2 of the Project study area (concourse segment). The rail yard would be elevated approximately 15 feet. New passenger platforms would be constructed on the elevated rail yard with associated vertical circulation elements (stairs, escalators, and elevators) to enhance safety elements and improve Americans with Disabilities Act accessibility. Platform 1, serving the Gold Line, would be lengthened and elevated to optimize east to west passenger circulation. The pedestrian passageway would be expanded to a 140-foot width to accommodate a substantial increase in passenger capacity with new functionally modern passenger amenities while providing points of safety to meet applicable California Building Code and National Fire Protection Association 130 Standard for Fixed Guideway Transit Systems. The expanded passageway and associated concourse improvements would facilitate enhanced passenger circulation and provide space for ancillary support functions (back-of-house uses, baggage handling, etc.), transit-serving retail, and office/commercial uses while creating an opportunity for an outdoor, community-oriented space with new plazas east and west of the elevated rail yard (East and West Plazas). Amtrak ticketing and baggage check-in services would be enhanced, and new carousels would be constructed in a centralized location under the rail yard. A canopy would be constructed over the West Plaza up to 70 feet in height, and two design options are considered for canopies that would extend over the rail yard.
- **Segment 3: Run-Through Segment (10 run-through tracks)** – The proposed Project includes up to 10 new run-through tracks (without a loop track) south of LAUS in Segment 3 of the Project study area (run-through segment). The proposed Project includes common rail infrastructure on the west bank of the Los Angeles River (vicinity of 1st Street Bridge) to support run-through tracks for both regional/intercity rail trains and future high-speed rail trains and the associated permanent loss of freight rail storage track capacity at the north end of BNSF West Bank Yard.

The proposed Project would also require modifications to US-101 and local streets (including potential street closures and geometric modifications); improvements to railroad signal, positive train control, and communications; modifications to the Gold Line light rail platform and tracks; modifications to the main line tracks on the west bank of the Los Angeles River; modifications to the Amtrak lead track; addition of access roadways to the railroad right-of-way (ROW); land acquisitions; addition of utilities; utility relocations, replacements, and abandonments; and addition of drainage facilities/water quality improvements.

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Figure 1-1. Project Location and Regional Vicinity

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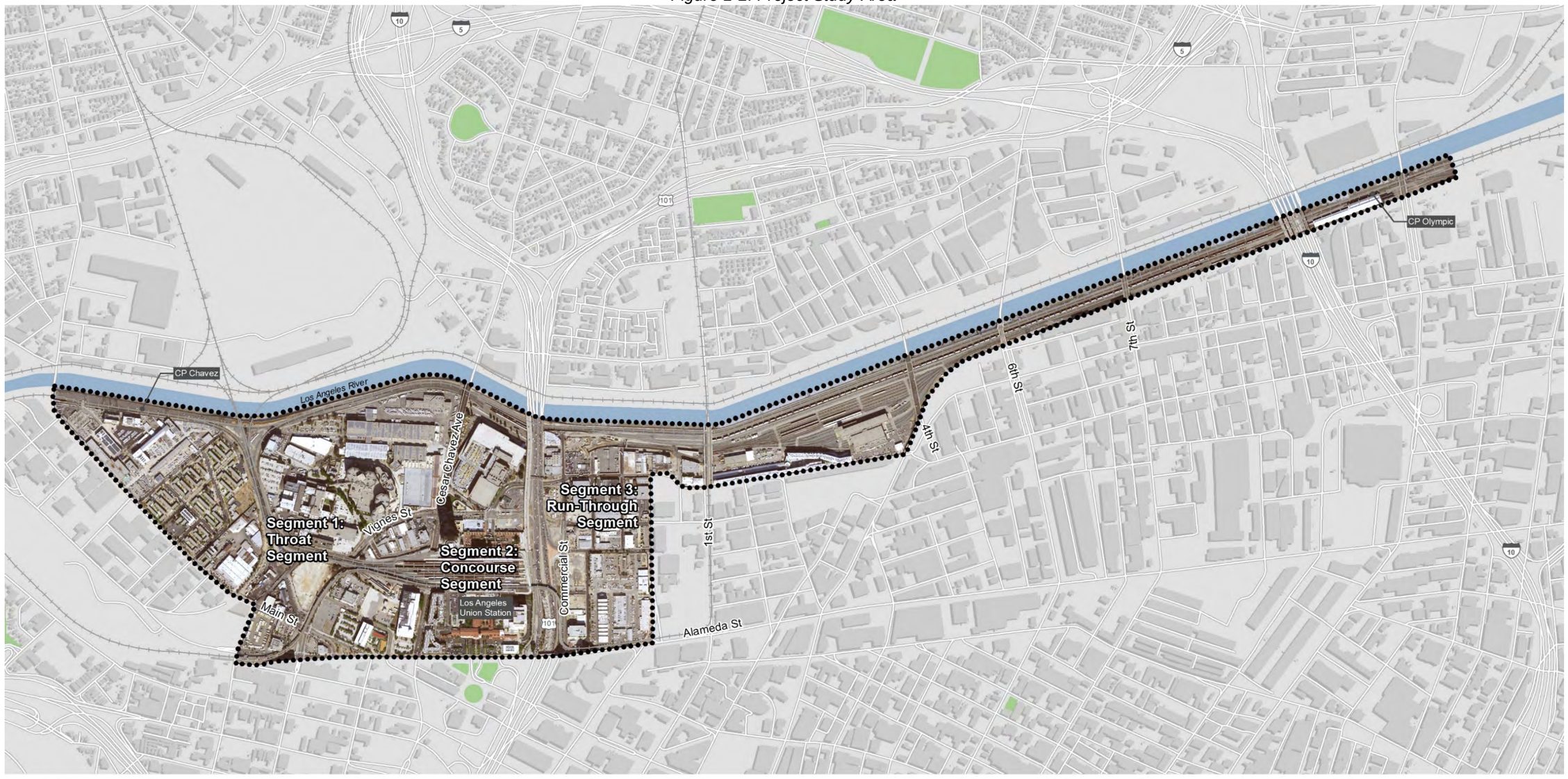
Figure 1-2. Project Study Area



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2.0 Purpose

The purpose of this Traffic Impact Assessment is to:

A) Document the Project-related VMT impacts on the existing roadway system;

B) Document the methods used to complete the analysis and the thresholds applied for determining significance;

C) Identify potential traffic impacts (and mitigation) associated with long-term operations of the proposed Project; and

D) Provide the necessary data, analysis, and documentation to support other environmental technical studies (air quality, noise, and vibration).

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3.0 Methodology

The methodology is broadly divided into two categories:

1. CEQA Transportation Analysis
2. Non-CEQA Transportation Analysis (This analysis was conducted as part of the Final EIR and, therefore, was not included as part of this report.)

The methodology flowchart that is described in detail in this section is presented on Figure 3-1.

3.1 CEQA Transportation Analysis

3.1.1 Conflicting with Plans, Programs, Ordinances, or Policies (Threshold T-1)

The proposed Project needs to be consistent with all the plans, policies, and guidelines that are adopted by the City of Los Angeles. In general, the transportation policies or standards adopted to protect the environment are those that support multi-modal transportation options and a reduction in VMT. Therefore, a proposed Project that is consistent with these policies would contribute towards the overall reduction of VMT. If there is a conflict, then improvements in the proposed Project that prioritize access for, and improve the comfort of, people walking, bicycling, and riding transit to provide safe and convenient streets for all users should be identified. The City of Los Angeles had adopted programs, plans, ordinances, and policies that establish the transportation planning framework for all travel modes. The list of key city plans and policies that will be reviewed against the proposed Project for consistency are listed below:

1. Los Angeles Mobility Plan 2035, September 7, 2016
2. Plan for a Healthy LA, March 2015
3. Downtown LA Community Plan, Spring 2021
4. Central City North Community Plan, September 7, 2016
5. Alameda District Specific Plan, June 18, 1996
6. Los Angeles Municipal Code (LAMC) Section 12.21.A.16 (Bicycle Parking), June 30, 2021
7. LAMC Section 12.26J (Transportation Demand Management Ordinance), June 30, 2021
8. Vision Zero Action Plan and Corridor Plans, November 2019
9. Streetscape Plans (Livable Boulevard Streetscape Plan, Exposition Boulevard Streetscape Plan)
10. Citywide Design Guidelines for Residential, Commercial, and Industrial Development, October 24, 2019
11. LADOT Manual of Policies and Procedures (Design Standards), July 2019

A Project that conforms with the city's plans, programs, ordinances, and policies would generally be consistent. If the Project is not consistent, the inconsistencies would need to be identified and changes to the proposed Project would be recommended to address those inconsistencies as mitigation measures.

3.1.2 Causing Substantial Vehicles Miles Traveled (Threshold T-2.1)

This criterion would only be applied to the Project if it is considered a land use project. A land use project is a project which includes new developments such as office, commercial, residential spaces, etc. The intent of this threshold is to provide a framework to assess whether the proposed Project would generate VMT which exceed the adopted VMT thresholds. The city-developed VMT threshold is presented in Table 3-1. The Area Planning Commission boundaries are presented on Figure 3-2. The proposed Project is located in the Central Area Planning Commission zones; therefore, the corresponding VMT thresholds for Central Area Planning Commission would be applicable to the proposed Project.

Table 3-1. Vehicle Miles Traveled Impact Criteria

Area Planning Commission	Daily Household VMT per Capita	Daily Work VMT per Employee
Central	6.0	7.6
East Los Angeles	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South Los Angeles	6.0	11.6
South Valley	9.4	11.6
West Los Angeles	7.4	11.1

Source: LADOT 2020

Notes:
VMT=vehicle miles traveled

Figure 3-1. Methodology Flowchart

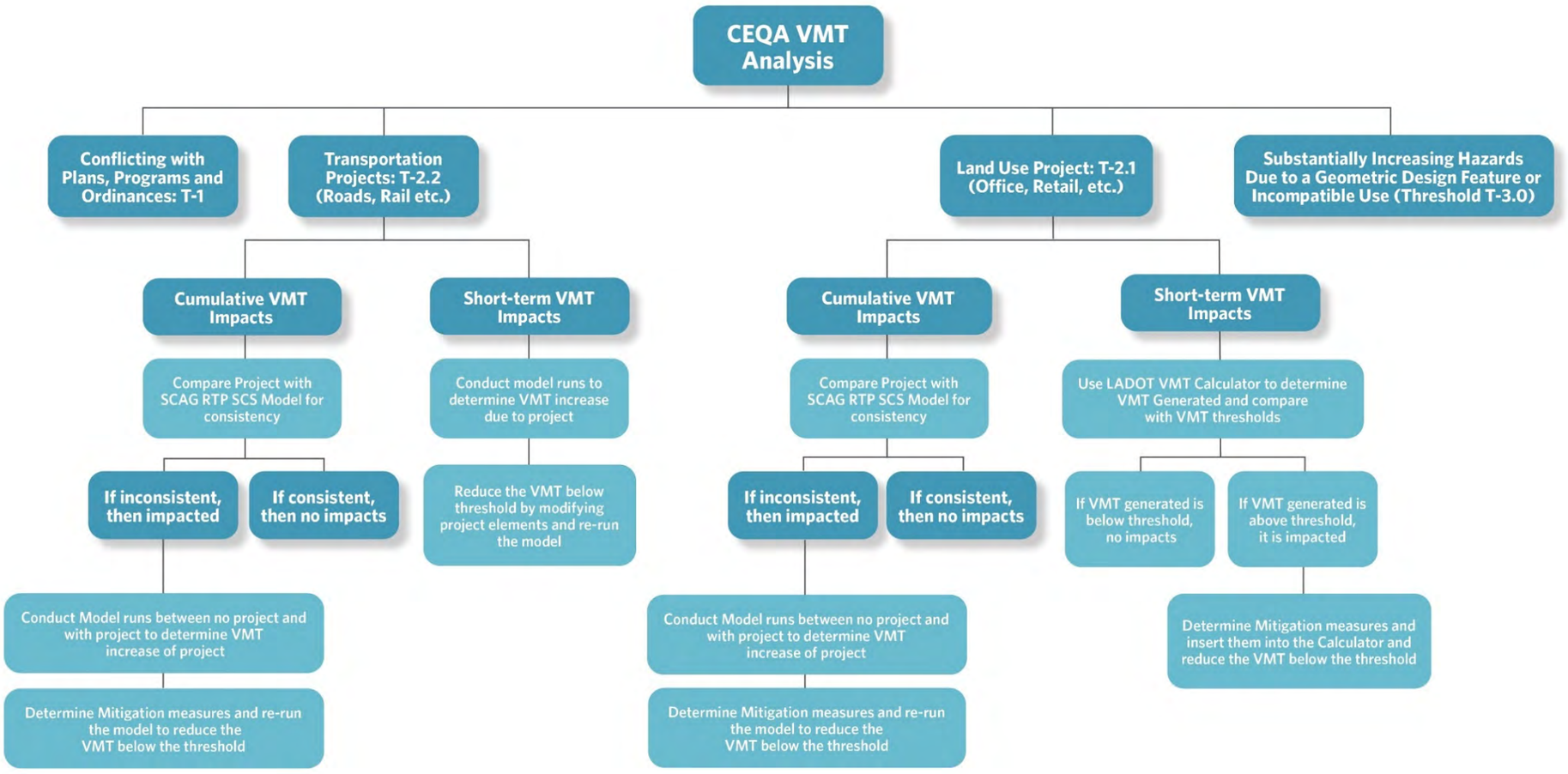

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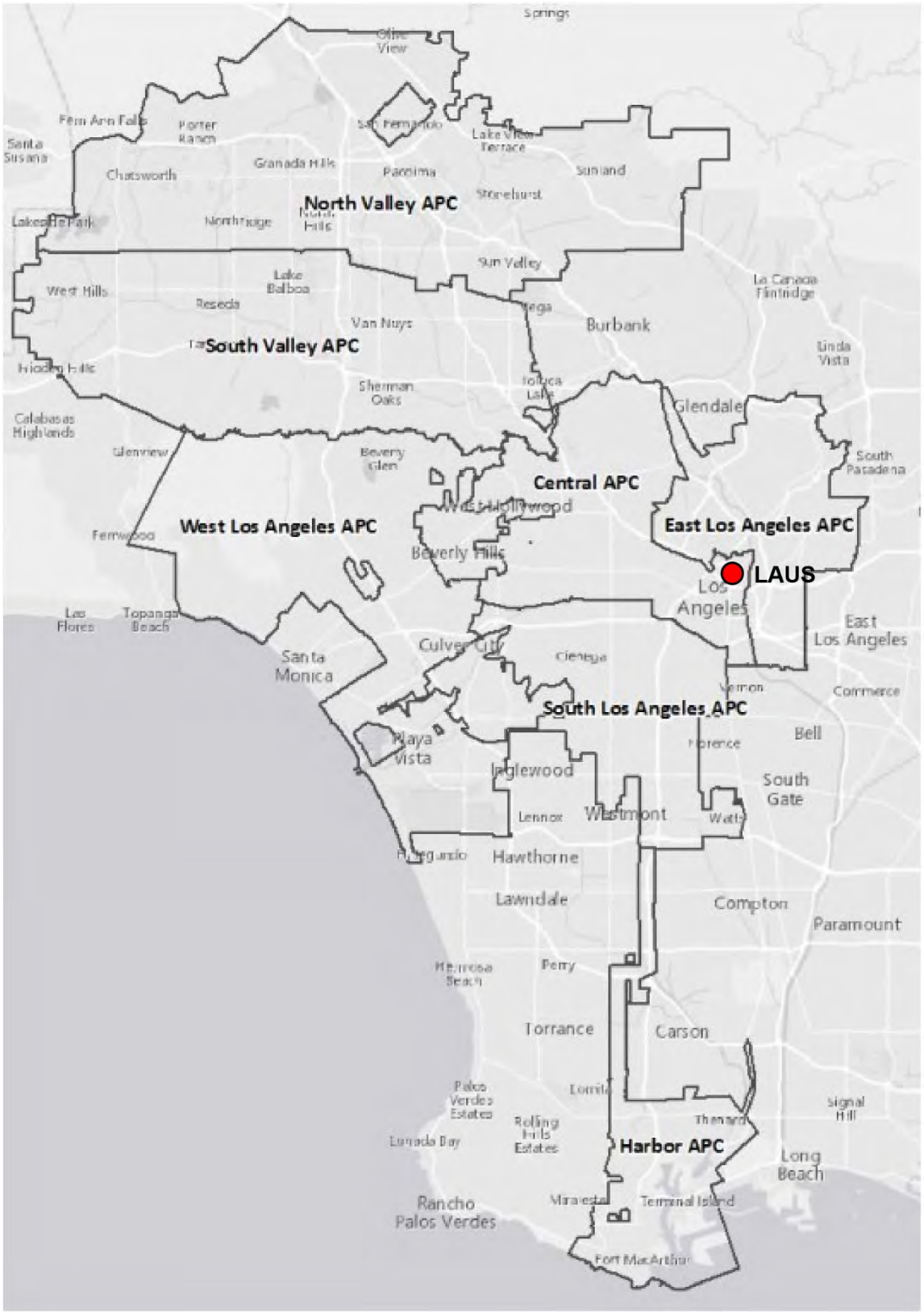
Figure 3-2. Area Planning Commission Boundaries in City of Los Angeles



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Short-Term Vehicle Miles Traveled Impacts

The proposed Project would be analyzed to calculate the daily vehicle trips, daily VMT, daily household VMT per capita, and daily work VMT per employee that would be generated by the Project during the opening year. The calculated parameters would then be compared with the thresholds presented in Table 3-1 to determine if they exceed the impact thresholds. If these parameters are below the impact thresholds, then there are no significant impacts of the Project in the short term. If these calculated parameters exceed the thresholds, then the Project is significantly impacted in the short term. The significant impacts would then need to be mitigated by a set of mitigation measures that are listed in the guidelines. These mitigation measures are transportation demand management strategies that are effective at reducing VMT to varying degrees of success are presented in Table 3-2.

Table 3-2. Transportation Demand Management Strategies as Mitigation Measures

Number	Category	Measures
1	Parking	• Reduce parking supply • Unbundle parking • Parking cash-out • Price workplace parking
2	Transit	• Reduce transit headways • Implement neighborhood shuttle • Transit subsidies
3	Education & Encouragement	• Voluntary travel behavior change program • Promotions and marketing
4	Commute Trip Reductions	• Required commute trip reduction program • Employer or association-sponsored vanpool or shuttle • Ride-share program
5	Shared Mobility	• Car share • Bike share • Other shared mobility devices • School carpool program
6	Bicycle Infrastructure	• Implement/improve on-street bicycle facility • Include outdoor bike parking • Include secure bike parking and showers
7	Neighborhood Enhancement	• Traffic calming improvements • Pedestrian network improvements • Shared use paths, paseos

Source: LADOT 2020

Notes:
VMT=vehicle miles traveled

Cumulative Vehicle Miles Traveled Impacts

The proposed Project would be compared with the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) for consistency based on the location of the proposed Project and the Project description. The SCAG RTP/SCS consists of a list of all land parcels and its corresponding allocated land use development and intensity of the new development. The proposed Project needs to be consistent with the proposed land use development and intensity of that development that is allocated to the corresponding project site in the SCAG RTP/SCS. The SCAG RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) reduction targets. Therefore, all projects that are consistent with this plan in terms of development location, density, and intensity are part of the regional solution for meeting air pollution, VMT, and GHG reduction goals. If the Project has no unmitigated short-term significant VMT impacts and is consistent with the SCAG RTP/SCS, then there are less than significant cumulative VMT impacts of the Project. However, if the Project is inconsistent with the SCAG RTP/SCS, then it could have significant cumulative VMT impacts.

Further evaluation would be necessary to determine whether the Project's cumulative impacts on VMT are significant or not. This analysis would be conducted by running the city's travel demand forecasting model with the cumulative no Project scenario representing the adopted RTP/SCS cumulative year conditions and the cumulative plus Project scenario representing the reallocation of the population and/or employment growth based on the land supply changes associated with the proposed Project. Daily vehicle trips, daily household VMT per capita and daily work VMT per employee would be calculated for both scenarios, and any increase in VMT above than what was forecast in the adopted RTP/SCS would be evaluated to determine if a significant impact would occur that could jeopardize regional air quality conformity or GHG reduction findings. If an impact is identified, the mitigation measures presented in Table 3-2 would be reviewed to recommended appropriate mitigation to avoid or reduce the significant Project impacts. The efficacy of the proposed mitigation measures would need to be validated by running the model with the mitigation measures to ensure that the VMT is below the significant threshold.

3.1.3 Substantially Inducing Additional Automobile Travel (Threshold T-2.2)

This criterion applies to transportation projects. A transportation project is a capital improvement project which includes infrastructure improvements, such as roads, highways, trains, etc. Transportation projects which increase speed and volume due to an increase in vehicular capacity could result in higher VMT. The intent of this threshold is to assess whether the proposed Project would generate VMT which exceed the VMT thresholds. It should be noted that transit projects or active transportation projects would generally reduce VMT and, therefore, are presumed to cause less than significant impacts.

Short-Term Vehicle Miles Traveled Impacts

The City of Los Angeles has developed a citywide travel demand forecasting model which is suitable for assessing the change in VMT due to a transportation project. This tool would be used to determine the change in VMT due to the proposed Project only if it is expected that the proposed Project may generate additional VMT. If the proposed Project is not expected to generate additional VMT, then the city's travel demand forecasting model runs are not required. If the change in VMT as a result of the model runs is below the thresholds, the proposed Project would have no significant impacts. If the change in VMT is above the thresholds, the Project would have significant impacts.

Cumulative Vehicle Miles Traveled Impacts

The proposed Project would be compared with SCAG RTP/SCS for inconsistency based on the location of the Project and the Project description. The SCAG RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. Therefore, all transportation projects that are included in this plan are part of the regional solution for meeting air pollution and GHG reduction goals. If the Project is consistent with the SCAG RTP/SCS, then there are less than significant cumulative VMT impacts of the Project. However, if the Project is inconsistent with the SCAG RTP/SCS, then it could have significant cumulative VMT impacts.

Further evaluation would be necessary to determine whether the Project's cumulative impacts on VMT are significant. This analysis would be conducted by running the city's travel demand forecasting model with the cumulative 'no Project' scenario representing the adopted RTP/SCS cumulative year conditions and the cumulative 'plus Project' scenario representing the reallocation of the population and/or employment growth based on the land supply changes associated with the proposed Project. Daily vehicle trips, daily household VMT per capita and daily work VMT per employee would be calculated for both scenarios, and any increase in VMT above that which was forecast in the adopted RTP/SCS would constitute a significant impact because it could jeopardize regional air quality conformity or GHG reduction findings. The mitigation measures would be recommended to mitigate the significant Project impacts. Some of the possible mitigation measures for transportation projects that are listed in the city's guidelines are as follows:

- Tolling new lanes to encourage carpools and funding transit improvements
- Converting existing general-purpose lanes to high-occupancy vehicle lanes, high-occupancy toll lanes, or bus lanes
- Cordon or congestion pricing to encourage sustainable travel behavior and fund district-wide mobility improvements
- Implementing or funding off-site mobility improvements, including the initiation of transportation management organization

- Implementing intelligent transportation systems strategies to improve passenger throughput on existing lanes

3.1.4 Substantially Increasing Hazard Due to a Geometric Design Feature or Incompatible Use (Threshold T-3.0)

The proposed Project would have to be evaluated to determine the impacts regarding the potential increase of hazards due to a proposed geometric design feature related to the design of access points to and from the Project site. The impacts could be related to safety, operation, or capacity, such as vehicle-vehicle, vehicle-bicycle, or vehicle-pedestrian conflicts. Evaluation of access impacts involves review of the Project land use, size, design, location of access points, etc. The evaluation would be analyzed in qualitative terms and in conjunction with the review of internal site circulation and access to parking areas.

3.2 Study Organization

The remainder of this traffic impact assessment is divided into the following sections:

- **Section 4.0: Land Use Project versus Transportation Project** presents the discussion regarding whether the proposed Project would be considered as a land use project, a transportation project, or both.
- **Section 5.0: Conflicting with Plans, Programs, Ordinances or Policies (Threshold T-1)** describes the analysis of the Project to check the consistency with all of city adopted plans, programs, and ordinances.
- **Section 6.0: Causing Substantial Vehicles Miles Traveled (Threshold T-2.1)** describes the VMT analysis of the Project to determine any significant impacts.
- **Section 7.0: Substantially Inducing Additional Automobile Travel (Threshold T-2.2)** describes the VMT analysis of the Project to determine any significant impacts.
- **Section 8.0: Substantially Increasing Hazard Due to a Geometric Design Feature or Incompatible Use (Threshold T-3.0)** presents the qualitative evaluation of all the access points to/from the Project site in terms of geometric design, freeway safety, and emergency vehicle access.
- **Section 9.0: Conclusion** identifies potential significant short-term and cumulative VMT impacts and mitigation measures to reduce those impacts.
- **Section 10.0:** References provides a list of all references cited in this report.

4.0 Land Use Project versus Transportation Project

Based on LADOT's TAG, a land use project is a project which consists of land use development such as new retail, residential, office, commercial or industrial. Also, a transportation project is an improvement in public infrastructure which could lead to additional vehicular/rail capacity, such as improvement in roadways, new auxiliary lanes, new travel lanes, signalization of intersections, roundabouts, new transit services, new train tracks etc. Typically, a new project would be considered either a land use project or a transportation project based on the type of development proposed. The classification of the new Project into either a land use project or a transportation project would then determine the type of VMT analysis (Threshold T-2.1 or Threshold T-2.2) that would be required to evaluate the Project's VMT impacts.

As presented in Section 1.0, the proposed Project is a transit-oriented development, which would increase rail capacity and passenger throughput by adding rail improvements such as new lead tracks in the throat segment, an elevated rail yard in the concourse segment, new run-through tracks, and an expanded passenger concourse at the existing station. Additionally, the proposed Project would also add 160,000 square feet of new retail and food service space and 30,400 square feet of new office/commercial space at LAUS. Therefore, the proposed Project can be uniquely considered as a land use project as well as a transportation project since a portion of the proposed improvements consists of land use improvements along with rail infrastructure enhancements. As a result, the VMT analysis which is applicable for land use project (Threshold T-2.1) and transportation project (Threshold T-2.2) was conducted for the proposed Project as part of this study.

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5.0 Conflicting with Plans, Programs, Ordinances, or Policies (Threshold T-1)

A screening was conducted to identify the potential for this Project to conflict with plans, programs, ordinances, or policies that specifically address the safety and performance of the transportation system, including transit, roadways, and bicycle and pedestrian facilities as listed in Section 3.1.1. Based on the review, the proposed project is consistent with the policies outlined in those plans. Therefore, the proposed project would contribute to the overall reduction in the VMT since the transportation policies, or standards adopted to protect the environment are those that support multi-modal transportation options and a reduction in VMT.

In addition to the review of transportation plans, policies adopted by the City, the proposed project needs to be consistent with the checklist presented in Appendix D of the LADOT's Transportation Assessment Guidelines as shown in Table 5-1, which summarizes these findings. The checklist includes the traffic-related policies required to be considered as part of a VMT analysis, as per LADOT's TAG (LADOT 2020). As shown, the proposed Project is consistent with all the listed plans, programs, ordinances, and policies and would therefore have no significant impacts.

5.1 Impact Analysis for Mobility Plan 2035 Public ROW Policy Alignment with Project Related Changes

TAG Guidelines: If the answer to either B.1 or B.2 are YES, City plans and policies should be reviewed in light of the proposed physical changes to determine if the City would be obstructed from carrying out the plans and policies. The analysis should pay special consideration to substantial changes to the public right of way that degrade the existing facilities for people walking and bicycling (e.g., removing crosswalk or bicycle lane), or preclude the City from completing complete street infrastructure as identified in the Mobility Plan 2035, especially if the physical changes are along streets that are on the High Injury Network (HIN). The following networks that are identified in the Mobility Plan 2035, or the HIN under which the project related street needs to be evaluated are as follows:

- *Transit Enhanced Network*
- *Bicycle Enhanced Network*
- *Bicycle Lane Network*
- *Pedestrian Enhanced District*
- *Neighborhood Enhanced Network*
- *High Injury Network*

As shown in Figure 5-1, the answer to B.1 was YES. The proposed project would physically modify the curb placement or turning radius and/or physically alter the sidewalk and parkways space that changes how people access a property at the intersection of Center Street and

Commercial Street. Therefore, further analysis as explained above would need to be conducted along these two streets to determine if the proposed improvements at the intersection would degrade the existing facilities for people walking and bicycling or preclude the City from completing complete streets improvement as identified in Mobility Plan 2035.

Based on the review of the Transportation Assessment Support Map[1], the Commercial Street does not fall under any of the above listed network while Center Street falls only under the Bicycle Enhanced Network. Neither street is included in the High Injury Network (HIN). The proposed improvements at Center Street/Commercial Street are shown on Figure 5-1 and are listed below:

- Commercial Street vacated east of Center Street changing the intersection configuration from a full intersection to a T-intersection
- Installation of an all-way stop sign control
- Americans with Disabilities Act-accessible curb ramps improvements at the southeast corner of Commercial Street/Garey Street intersection and southwest corner of Commercial Street/Vignes Street intersection
- New pedestrian crosswalks at Commercial Street/Vignes Street intersection
- New wider sidewalk along the north side of Commercial Street from Vignes Street to Center Street
- New pedestrian crosswalks across all legs of Commercial Street/Center Street intersection
- Americans with Disabilities Act-accessible curb ramps installed on either side of Old Center Street to accommodate new pedestrian crossing
- New wider sidewalk along east side of Center Street from Ducommun Street to Commercial Street
- Bicycle lanes along both sides of Commercial Street and Center Street
- Provision of a pedestrian and vehicle route to the Amay's Bakery as shown on Figure 5-2

The proposed improvements at Center Street/Commercial Street would not degrade but enhance the existing pedestrian and bicycle facilities and would not preclude the City from completing complete streets improvements as identified in Mobility Plan 2035.

[1] https://lahub.maps.arcgis.com/apps/View/index.html?appid=77094c99878341bfadf15814aec76fb0&extent=-119.0527,33.8893,-118.1360,34.4013

Figure 5-1. Center Street and Commercial Street Improvements

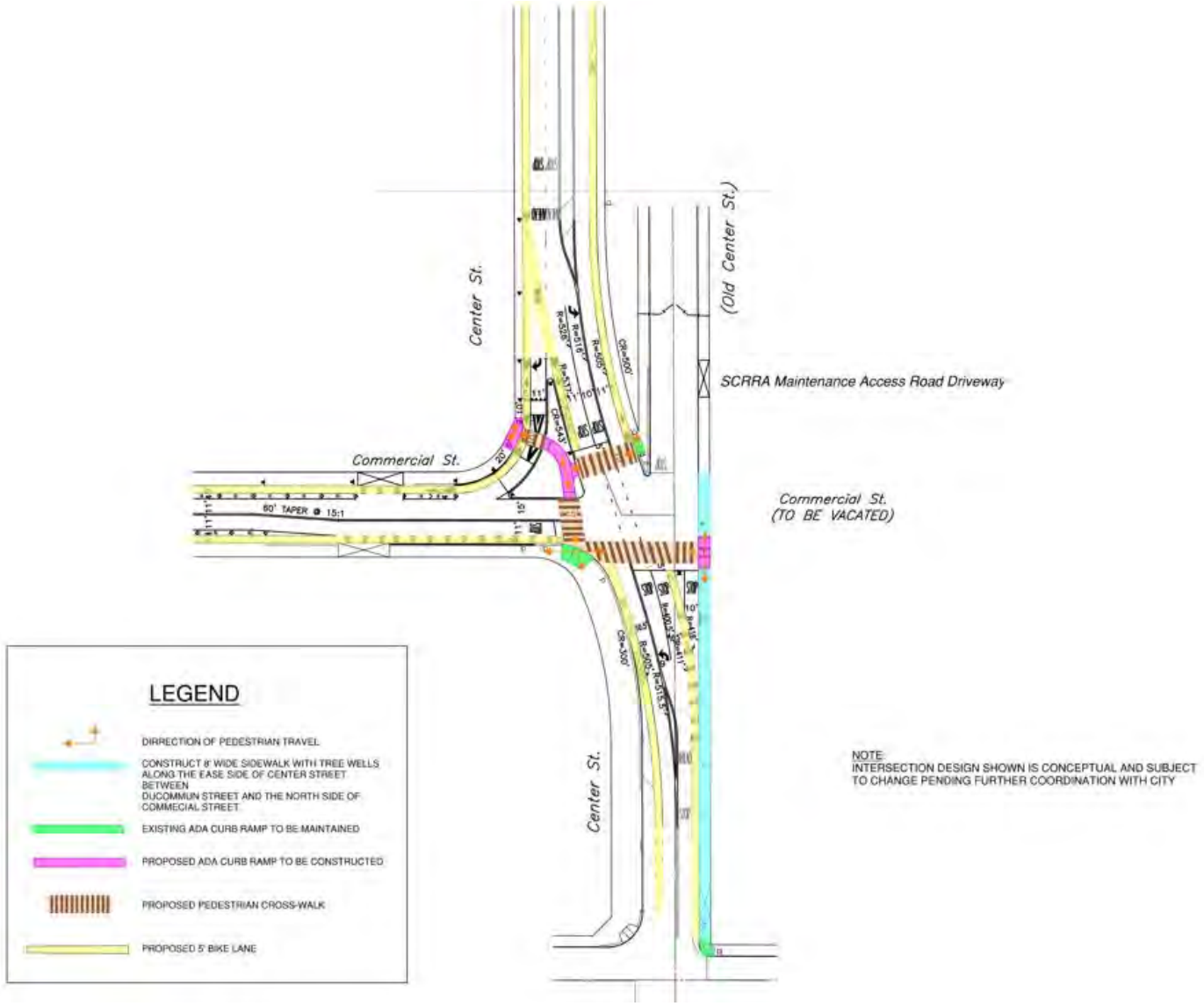

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Figure 5-2. Commercial Street Property Pedestrian Access Plan

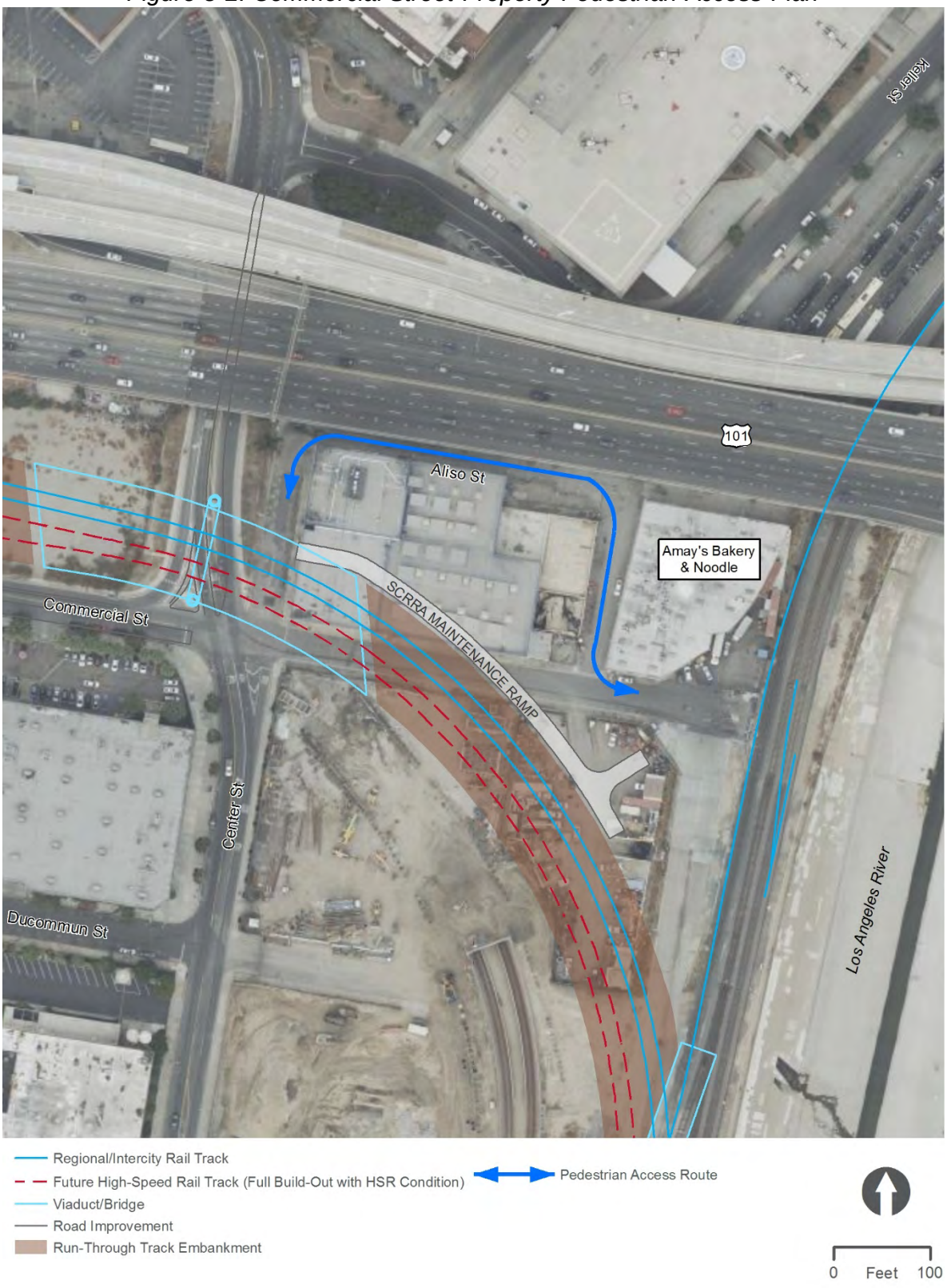

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Table 5-1. Plans, Programs, Ordinance and Policies Checklist

No.	Guiding Questions	Relevant Plans, Policies, and Program	Answers
A. Mobility Plan 2035 Public ROW Classification Standards for Dedications and Improvements			
A.1	Does the Project include additions or new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on properly zoned for R3 or less restrictive zone?	• **Mobility Plan 2035 Policy 2.1 – Adaptive Reuse of Streets.** Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands. • **Mobility Plan 2035 Policy 2.3 – Pedestrian Infrastructure.** Recognize walking as a component of every trip and ensure high quality pedestrian access in all site planning and public ROW modifications to provide a safe and comfortable walking environment. • **Mobility Plan 2035 Policy 3.2 – People with Disabilities.** Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public ROW. • **Mobility Plan 2035 Street Designations and Standard Roadway Dimension**	Yes, the Project does include additions or new construction along a street designated as a Boulevard I, II and/or Avenue I, II, and III, such as Center Street and Cesar Chavez Avenue, which are classified as Avenue III and Avenue I, respectively.
A.2	If A.1 is yes, is the Project required to make additional dedications or improvements to the public ROW as demonstrated by the street designation.		Yes, the Project would be making additional dedications or improvements along Cesar Chavez Avenue, such as widening, which is consistent with the Avenue III typical section by the city.
A.3	If A.2 is yes, is the Project making the dedications and improvements as necessary to meet the designated dimensions of the fronting street (Boulevard I, and II, or Avenue I, II or, III)?		Yes, the Project would be making additional dedications or improvements along Cesar Chavez Avenue, such as widening, which is consistent with the Avenue III typical section by the city.
If the answer to A.1 is No, or to A.1, A.2 and A.3 is Yes. Then the Project does not conflict with the dedication and improvement requirements that are needed to comply with the Mobility Plan 2035 Street Designations and Standard Roadway Dimensions.			
B. Mobility Plan 2035 Public ROW Policy Alignment with Project-Initiated Changes			
B.1	Does the Project physically modify the curb placement or turning radius and/or physically alter the sidewalk and parkways space that changes how people access a property?	• **Mobility Plan 2035 Policy 2.1 – Adaptive Reuse of Streets.** Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands. • **Mobility Plan 2035 Policy 2.3 – Pedestrian Infrastructure.** Recognize walking as a component of every trip and ensure high quality pedestrian access in all site planning and public ROW modifications to provide a safe and comfortable walking environment. • **Mobility Plan 2035 Policy 3.2 – People with Disabilities.** Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public ROW. • **Mobility Plan 2035 Policy 2.10 – Loading Areas.** Facilitate the provision of adequate on and offsite street loading areas. • **Mobility Plan 2035 Street Designations and Standard Roadway Dimension**	Yes, the Project would physically modify the curb placement or turning radius and/or physically alter the sidewalk and parkways space that changes how people access a property along Commercial Street/Center Street intersection. Below are the improvements: • Americans with Disabilities Act-accessible curb ramps improvements at the southeast corner of Commercial Street/Garey Street intersection and southwest corner of Commercial Street/Vignes Street intersection • New pedestrian crosswalks at Commercial Street/Vignes Street intersection • New wider sidewalk along the north side of Commercial Street from Vignes Street to Center Street • New pedestrian crosswalks across all legs of Commercial Street/Center Street intersection • Americans with Disabilities Act-accessible curb ramps installed on either side of Old Center Street to accommodate new pedestrian crossing • New wider sidewalk along east side of Center Street from Ducommun Street to Commercial Street
B.2	Does the Project add new driveways along a street designated as an Avenue or Boulevard that conflict with LADOT's Driveway Design Guidelines (See Sex.321 in the Manual of Policies and Procedures)?	• **Mobility Plan 2035 Policy 2.10 – Loading Areas.** Facilitate the provision of adequate on and offsite street loading areas.	No, the Project would not add a new driveway along a street designated as an Avenue or Boulevard that conflict with LADOT's Driveway

Table 5-1. Plans, Programs, Ordinance and Policies Checklist

No.	Guiding Questions	Relevant Plans, Policies, and Program	Answers
		• **Mobility Plan 2035 Program PL.1. Driveway Access.** Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement. • **Citywide Design Guidelines - Guideline 2:** Carefully incorporate vehicular access such that it does not degrade the pedestrian experience	Design Guidelines, which is Center Street/Old Center Street. New driveway would be added as part of the Project, but it would not conflict with LADOT's Driveway Design Guidelines.
B.2.1	If either B.1 or B.2 are Yes, would the physical changes in the public ROW or new driveways that conflict with LADOT's Driveway Design Guidelines degrade the experience of vulnerable roadway users such as modify, remove, or otherwise negatively impact existing bicycle, transit, and/or pedestrian infrastructure?		No, the physical changes in the public ROW added on Center Street would not degrade the experience of vulnerable roadway users. The proposed improvements will improve the pedestrian, and bicycle infrastructure. as shown on Figure 5-1.
B.2.2	If B.1 and B.2 are both Yes, would the physical modifications or new driveways that conflict with LADOT's Driveway Design Guidelines preclude the city from advancing the safety of vulnerable roadway users?		Not Applicable since B.2 is NO.
If answer to B.1 and B.2 are both No, then the Project would not conflict with a plan or policies that govern the Public ROW as a result of the Project-initiated changes to the Public ROW. If B.1 or B.2 is Yes, then if either of the answers to either B.21 or B.2.2 are YES, the Project may conflict with the Mobility Plan 2035, and therefore conflict with a plan that is adopted to protect the environment. If either of the answers to both B.2.1. or B.2.2. are NO, then the Project would not be shown to conflict with plans or policies that govern the Public ROW.			
C. Network Access			
C.1	Alley, Street and Stairway Access		
C.1.1	Does the Project propose to vacate or otherwise restrict public access to a street, alley, or public stairway?	• **Mobility Plan Policy 3.9 Increased Network Access:** Discourage the vacation of public ROW.	No, the Project does not propose to vacate or otherwise restrict public access to a street, alley, or public stairway.
C.1.2	If the answer to C.1 is Yes, will the Project provide or maintain public access to people walking and biking on the street, alley, or stairway?		—
C.2	New Cul-de-Sacs		
C.2.1	Does the Project create a cul-de-sac or is the Project located adjacent to an existing cul-de-sac?	• **Mobility Plan 2035 Policy 3.10 Cul-de-sacs:** Discourage the use of cul-de-sacs that do not provide access for active transportation options	Yes, the Project is located adjacent to the cul-de-sac on Commercial Street, which would be accessed from Aliso Street and private alley east of Amay's Bakery.
C.2.2	If yes, will the cul-de-sac maintain convenient and direct public access to people walking and biking to the adjoining street network?		Yes, the cul-de-sac on Commercial Street would be removed but shall maintain convenient and direct public access to people walking and biking to the adjoining street network. The removal of the existing cul-de-sac on Commercial Street would not affect the public access to people walking and biking to the adjoining street network. As shown on Figure 5-2, the access to Amay's Bakery property will be maintained via Old Center Street and Aliso Street.
If the answers to either C.1.2 or C.2.2 are YES, then the Project would not conflict with a plan or policies that ensures access for all modes of travel.			
D. Parking Supply and Transportation Demand Management			
D.1	Would the Project propose a supply of onsite parking that exceeds the baseline amount as required in the LAMC or a Specific plan, whichever requirement prevails?	• **Mobility Plan 2035 Policy 3.8** - Bicycle Parking, provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.	No, the Project does not propose on-site parking that exceeds the baseline amount as required by LAMC.

Table 5-1. Plans, Programs, Ordinance and Policies Checklist

No.	Guiding Questions	Relevant Plans, Policies, and Program	Answers
D.2	If the answer to D.1 is Yes, would the Project propose to actively manage the demand of parking by independently pricing the supply to all users, or for residential properties, unbundle the supply from the leave or sale of residential units?	• **Mobility Plan 2035 Policy 4.8** - Transportation Demand Management Strategies Encourage greater utilization of Transportation Demand Management Strategies to reduce dependence on single occupancy vehicles. • **Mobility Plan 2035 Policy 4.13** - Parking and Land Use Management: Balance on-street and off-street parking supply with other transportation and land use objectives.	—
D.3	Would the Project provide the minimum on an off-site bicycle parking spaces as required by Section 12.21 A.16 of the LAMC?		No, the Project would not provide the minimum on- and off-site bicycle parking spaces as required by Section 12.21 A.16 of the LAMC. The intent of the new retail and food service floor area is to serve rail transit patrons as opposed to new patrons from the outside of the Project. The existing level of bicycle parking on-site would be adequate to serve the new office space and the retail employees.
D.4	Does the Project include more than 25,000 square feet of gross floor area construction of new non-residential gross floor?		Yes, the Project includes more than 25,000 square feet of gross floor area construction of new non-residential gross floor. This floor area is 190,400 square feet.
D.5	If the answer to D.4 is Yes, does the Project comply with the city's Transportation Demand Management Ordinance in Section 12.26.J of the LAMC?		Yes, the Project complies with the City's Transportation Demand Management Ordinance in Section 12.26.1 of LAMC.
If the answer to D.2. is YES the Project may not conflict with city's parking management policies.			
E. Consistency with Regional Plans			
E.1	Does the Project or Plan apply one the city's efficiency-based impact thresholds (i.e., VMT per capita, VMT per employee, or VMT per service population) as discussed in Section 2.2.3 or the TAG?	—	Yes, the Project does apply city's efficiency-based impact thresholds as discussed in Section 2.2.3 of the TAG.
E.2	If the Answer to E.1 is Yes, does the Project or Plan result in a significant VMT impact?	—	No, the Project does not result in a significant VMT impact.
E.3	If the Answer to E.1 is NO, does the Project result in a net increase in VMT?	—	No, the Project does not result in a net increase in VMT.
If the Answer to E.2 or E.3 is NO, then the Project or Plan is shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS.			

Source: LADOT 2020
Notes:
GHG=greenhouse gas; LADOT=Los Angeles Department of Transportation; LAMC=Los Angeles Municipal Code; ROW=right-of-way; RTP=Regional Transportation Plan; SCAG=Southern California Association of Governments; SCS=Sustainable Community Strategy; TAG=Transportation Assessment Guidelines; VMT=vehicle miles traveled

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6.0 Causing Substantial Vehicle Miles Traveled (Threshold T-2.1)

6.1 Short-Term Vehicle Miles Traveled Impacts

As explained in Section 3.1.2, the VMT generated by the proposed land use project was calculated using the VMT calculator developed by the city. The proposed Project would consist of the following land use developments:

- 160,000 square feet of new retail and fast-food restaurants.
- 30,400 square feet of new office space.

The proposed retail/fast-food restaurants and office land uses, along with its corresponding square footage, was included in the calculator to determine the total daily vehicle trips, daily VMT, and work VMT per employee. The calculation of these parameters using the VMT calculator is presented on Figure 6-1. The trip generation table in the Final EIR had assumed 160,000 square feet of 'transit-oriented retail' whereas the VMT calculator assumes 110,000 square feet of retail and 50,000 square feet as fast-food restaurants since the nature of the proposed food service at LAUS would be more of a fast-food type of restaurants.

The proposed Project would not add any new parking to the Union Station campus. Any employee travel via automobile to/from the proposed Project would result in vehicles parking in the Union Station parking supply which charges a fee to park. Therefore, the reduction in on-site Code parking supply and the imposition of parking charges for employee parking were considered as Project Design Features in the VMT analysis because they are inherent elements of the Project.

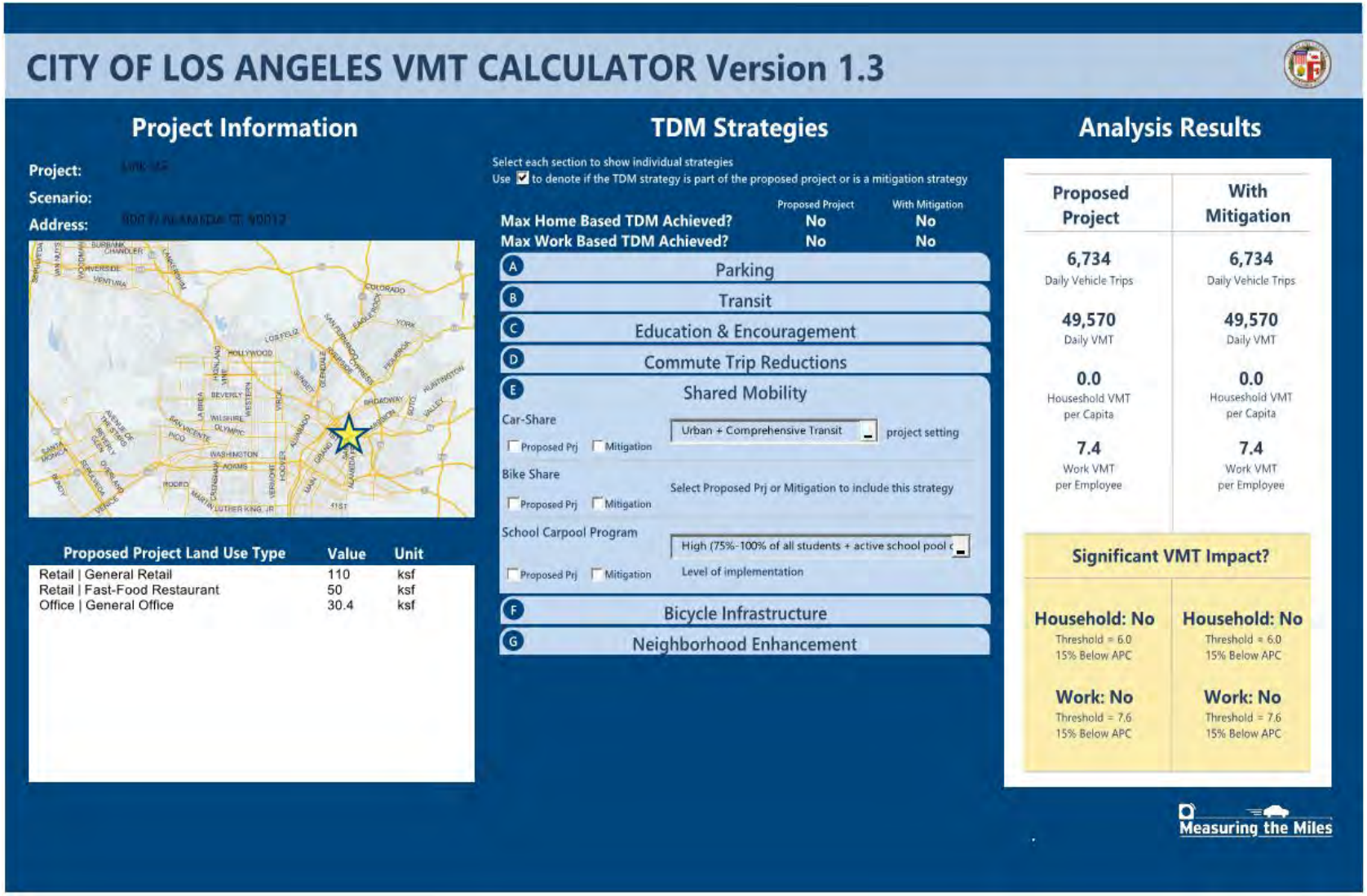
As shown on Figure 6-1, the total daily vehicle trips generated by the proposed Project was 6,734, the daily VMT generated was 49,570, and the calculated work VMT per employee was 7.4. The proposed Project is located within the Central Area Planning Commission zone. As shown in Table 3-1, the threshold for significant impacts from a typical land use project is 7.6 work VMT per employee. Since the proposed Project would generate 7.4 work VMT per employee, the Project would have no significant short-term VMT impacts. The detailed VMT calculator worksheets are presented in Appendix A.

6.2 Cumulative Vehicle Miles Traveled Impacts

As explained in Section 3.1.2, the proposed Project was compared with the SCAG RTP/SCS for consistency based on the location of the Project and the Project description. The proposed Project needs to be consistent with the land use and the intensity allocated to the corresponding Project site in the SCAG RTP/SCS. The SCAG RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. Therefore, all projects that are consistent with this plan in terms of development location, density, and intensity, are part of the regional solution for meeting air pollution and GHG reduction goals.

LAUS, which is a major transit hub in Los Angeles, would be improved by adding retail/commercial and office space within the station. These improvements would serve the day-to-day operations of the transit station. The proposed Project does not involve demolishing the transit station altogether and building a standalone retail/commercial and office spaces thereby changing the land use makeup and intensity of the Project site, which could result in inconsistency with the SCAG RTP/SCS. The proposed Project is consistent with the SCAG RTP/SCS and there would be no significant cumulative VMT impacts. As a result, the city's travel demand forecasting model runs to evaluate significant VMT impacts of the Project were not required.

Figure 6-1. Vehicle Miles Traveled Calculation using Los Angeles Department of Transportation's Vehicle Miles Traveled Calculator



Source: LADOT 2020

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7.0 Substantially Inducing Additional Automobile Travel (Threshold T-2.2)

7.1 Short-Term Vehicle Miles Traveled Impacts

As explained in Section 3.1.3, the intent of this analysis is to assess whether the proposed transportation Project would generate VMT which exceed the VMT thresholds. It should be noted that transit projects or active transportation projects would generally reduce automobile VMT and therefore are presumed to cause less than significant VMT impacts. The proposed Project predominantly involves transit and rail improvements that would enhance regional accessibility to and through LAUS. As a result, the Project can be expected to increase transit ridership and, reduce regional VMT. Therefore, the proposed project is anticipated to have no significant short-term VMT impact. The city's travel demand forecasting model runs for further evaluating the VMT impacts of the proposed Project are not required.

7.2 Cumulative Vehicle Miles Traveled Impacts

As explained in Section 3.1.3, the proposed Project was compared with the SCAG RTP/SCS for consistency based on the location of the Project and the Project description.

LAUS would be improved by adding additional rail and transit capacity within the station. These improvements would serve the day-to-day operations of the transit station. The proposed Project adds transit-related improvements to an existing transit station. Since the proposed Project is adding similar type of infrastructure improvements to the existing infrastructure facility, it is consistent with the SCAG RTP/SCS and there would be no significant cumulative VMT impacts. The city's travel demand forecasting model runs to evaluate significant cumulative VMT impacts of the Project were not required.

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8.0 Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use (Threshold T-3)

The impacts regarding the potential increase in hazards due to the proposed geometric design feature generally relates to the design of access points to and from the Project site and may include safety, operational, or capacity impacts. Impacts can be related to vehicle-vehicle, vehicle-bicycle, or vehicle-pedestrian conflicts. These conflicts may be created due to the driveway configuration or through the placement of project driveways in areas of inadequate visibility, adjacent to bicycle or pedestrian facilities or too close to busy or congested intersection.

For this evaluation, a total of four access points to the LAUS property were considered. These locations are presented on Figure 8-1 and listed below:

1. Alameda Street Entrance
2. Cesar Chavez Avenue Entrance
3. Cesar Chavez Avenue/Vignes Street entrance for pedestrians
4. Vignes Street Entrance (Gateway Plaza)

The engineering plans for the proposed Project were reviewed against the city's traffic engineering design standards to determine if there were any potential hazards due to the design configuration at any of the above listed access points. Based on the review, the proposed Project would not significantly change the design or operation of the existing access points for locations 1 through 4 and therefore the geometrics are not expected to result in increased hazards. The proposed Project does not include any modifications to the four access points to LAUS. Therefore, there would be no impacts regarding the potential increase in hazards due to the proposed geometric design feature relating to the design of access points to and from the Project site.

8.1 Emergency Vehicle Access

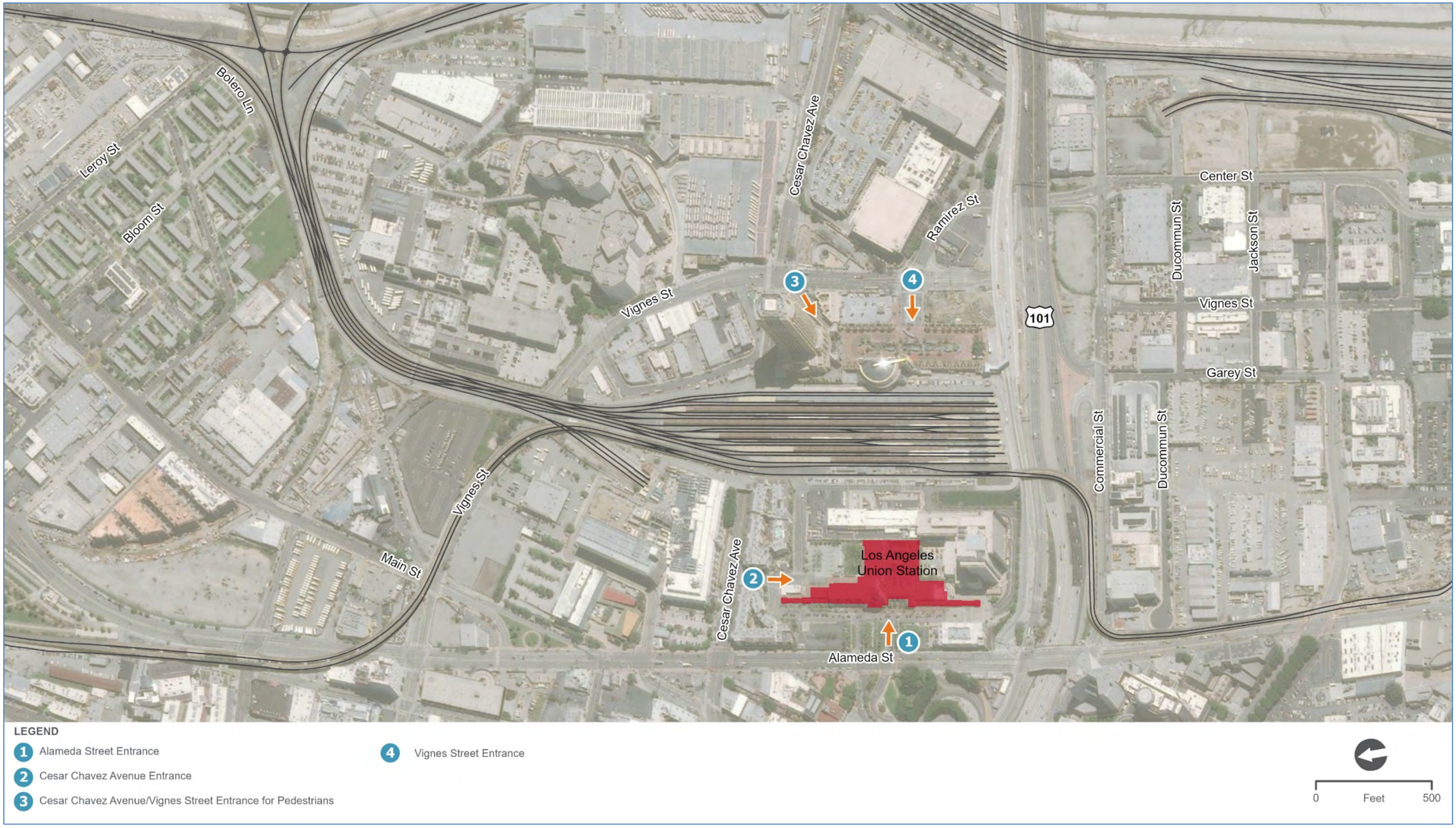
The existing access points provide emergency access to LAUS. Since the existing access points would not change as part of the proposed Project, no impacts on emergency vehicle access would occur. Also, the traffic analysis that was conducted as part of the Final EIR concluded that the amount of traffic generated by the proposed Project would not change the traffic operations at any of the signalized intersections in the vicinity of the Project that provide direct access for emergency vehicles to the Project site. Hence, the proposed Project would not have any significant impact to the emergency vehicle access to the Project site.

8.2 Freeway Safety Analysis

The freeway safety analysis interim guidelines were developed on May 1, 2020, by Freeway Analysis Technical Working Group that comprised transportation professionals from LADOT, Los Angeles City Attorney's Office, and transportation engineering, planning, and environmental firms which have extensive experience developing transportation analysis in Southern California (LADOT Freeway Analysis Technical Working Group 2020). These guidelines were prepared in response to recent comment letters sent by California Department of Transportation District 7 to the city in which California Department of Transportation had requested that the environmental traffic analysis should include the proposed Project's impacts on the vehicle queuing on freeway off-ramps in the vicinity of the Project. This evaluation would measure the Project's potential to lengthen the vehicular queue formation at freeway off-ramps, which would result in speed differential between vehicles exiting the freeway off-ramps and vehicles operating on freeway main line segment resulting in safety concerns.

As part of this analysis, the proposed Project trips, which are expected to be added to freeway off-ramps in the vicinity of the Project, were identified from the traffic impact assessment conducted as part of the Final EIR. If the Project adds 25 or more trips on any off-ramp in AM or PM peak hour, then further analysis would be required to determine the queue formation at that off-ramp. Since the proposed Project would not add 25 or more trips on any of the freeway off-ramps (US-101, Interstate 5, Interstate 110, Interstate 10 and State Route 60) within the vicinity of the Project, no queueing analysis is required for this Project to determine any possible queuing related impacts on freeway off-ramps.

Figure 8-1. Access Points to Los Angeles Union Station



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9.0 Conclusion

This traffic impact assessment was undertaken to analyze potential traffic and VMT impacts of the proposed Project. The conclusion of the analysis is summarized in Section 9.1 and 9.2.

9.1 CEQA Transportation Analysis

9.1.1 Conflicting with Plans, Programs, Ordinances, or Policies (Threshold T-1)

The Project improvements align with all the city's adopted plans, programs, ordinances, and policies that focus on the on the safety and performance of the transportation system. Since the proposed Project is consistent with the guidelines, there are no significant impacts.

9.1.2 Causing Substantial Vehicles Miles Traveled (Threshold T-2.1)

Short-Term VMT Impacts: The proposed Project would include 160,000 square feet of new retail and food service area and 30,400 square feet of new office space to serve commuters. The VMT calculator was used to calculate the daily vehicle trips, daily VMT, household VMT per capita, and work VMT per employee by the trip generating elements of the proposed Project. The proposed land use Project would generate VMT per employee of 7.4, which is below the significant impact threshold of 7.6 for the new development located within the Central Area Planning Commission zone. Therefore, there are no significant short-term impacts of the proposed Project.

Cumulative VMT Impacts: The SCAG RTP/SCS consists a list of all land parcels and the corresponding allocated land use development and intensity of new development. The proposed Project was compared with the SCAG RTP/SCS to determine whether the proposed Project is consistent with the allowable land use development and intensity of improvements of the land parcel of the Project site. Since the proposed Project would not create an unmitigated significant VMT impact and would result in an improvement to an existing transit facility, which is already consistent with the SCAG RTP/SCS designation for the parcel on which the existing Project is located, there are no cumulative VMT impacts of the Project. Further analysis by running the city's travel demand model is not required for the Project.

9.1.3 Substantially Inducing Additional Automobile Travel (Threshold T-2.2)

Short-Term VMT Impacts: The proposed Project consists of transportation-related improvements to improve the rail capacity and passenger throughput of LAUS. The proposed improvements are anticipated to reduce the regional VMT and GHG emissions, since the proposed improvements are transit oriented. Hence, the proposed Project would have no short-term impacts.

Cumulative VMT Impacts: The proposed Project improvements were compared with the SCAG RTP/SCS to determine the consistency of the proposed improvements with the allowable improvements for the land parcel where the Project site is located. The proposed Project would add to the already existing transit infrastructure in order to improve the day-to-day operations of the transit station by adding new rail and transit capacity. The proposed Project would not change the existing land use of the parcel. Therefore, the proposed Project is consistent with the SCAG RTP/SCS and would have no cumulative VMT impacts and further analysis by running the city's travel demand model is not required for the Project.

9.1.4 Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use (Threshold T-3)

Preliminary Project access plans of the proposed Project were reviewed in light of the city's traffic engineering design standards to determine if there were any potential hazards due to the design configuration at any of the access points proposed as part of the project improvement. Based on the review, the proposed Project would not significantly change the existing access points at four locations considered in terms of design configuration, and therefore no impacts related to geometric design or operations are anticipated.

Additionally, the proposed Project would not have any significant impacts on the emergency vehicle access to the Project site or the safety of the off-ramps of nearby freeways.

9.2 Non-CEQA Transportation Analysis

The non-CEQA analysis for this Project was conducted as part of the traffic impact assessment as part of the Final EIR (Metro 2019) and, therefore, this analysis was not included in this report.

10.0 References

City of Los Angeles Department of Transportation (LADOT). 2020. Transportation Assessment Guidelines (TAG). Bureau of Planning and Development Services. https://ladot.lacity.org/sites/default/files/2020-07/ta_guidelines_all-sections_2020.07.04_attachments.pdf.

Los Angeles County Metropolitan Transportation Authority (Metro). 2019. Link Union Station Final Environmental Impact Report. Prepared by HDR Engineering, Inc. https://www.metro.net/projects/link-us/final-ei-report/.

Los Angeles Department of Transportation (LADOT) Freeway Analysis Technical Working Group. 2020. *Freeway Safety Analysis Interim Guidelines*. May 1, 2020.

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Appendix A.
Los Angeles Department of Transportation Vehicle Miles Traveled Calculator

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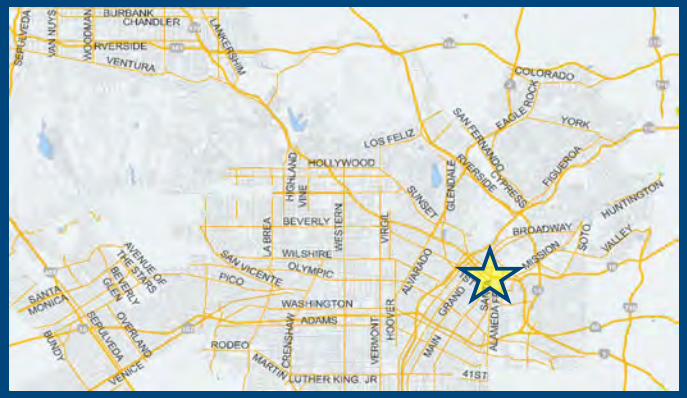
CITY OF LOS ANGELES VMT CALCULATOR Version 1.3

Project Information

Project: Link US

Scenario:

Address: 800 N ALAMEDA ST, 90012



Proposed Project Land Use Type	Value	Unit
Retail | General Retail	110	ksf
Retail | Fast-Food Restaurant	50	ksf
Office | General Office	30.4	ksf

TDM Strategies

Select each section to show individual strategies

Use ☑ to denote if the TDM strategy is part of the proposed project or is a mitigation strategy

	Proposed Project	With Mitigation
Max Home Based TDM Achieved?	**No**	**No**
Max Work Based TDM Achieved?	**No**	**No**

- **A** Parking
- **B** Transit
- **C** Education & Encouragement
- **D** Commute Trip Reductions
- **E** Shared Mobility

Car-Share

☐ Proposed Prj ☐ Mitigation — Urban + Comprehensive Transit — project setting

Bike Share

☐ Proposed Prj ☐ Mitigation — Select Proposed Prj or Mitigation to include this strategy

School Carpool Program

☐ Proposed Prj ☐ Mitigation — High (75%-100% of all students + active school pool c — Level of implementation

- **F** Bicycle Infrastructure
- **G** Neighborhood Enhancement

Analysis Results

Proposed Project	With Mitigation
6,734 Daily Vehicle Trips	**6,734** Daily Vehicle Trips
49,570 Daily VMT	**49,570** Daily VMT
0.0 Household VMT per Capita	**0.0** Household VMT per Capita
7.4 Work VMT per Employee	**7.4** Work VMT per Employee

Significant VMT Impact?

Proposed Project	With Mitigation
Household: No Threshold = 6.0 15% Below APC	**Household: No** Threshold = 6.0 15% Below APC
Work: No Threshold = 7.6 15% Below APC	**Work: No** Threshold = 7.6 15% Below APC

Measuring the Miles

CITY OF LOS ANGELES VMT CALCULATOR

Report 1: Project & Analysis Overview

Date: March 23, 2021
Project Name: Link US
Project Scenario:
Project Address: 800 N ALAMEDA ST, 90012

Version 1.3

Project Information			
Land Use Type		**Value**	**Units**
Housing	*Single Family*	*0*	*DU*
	Multi Family	*0*	*DU*
	Townhouse	*0*	*DU*
	Hotel	*0*	*Rooms*
	Motel	*0*	*Rooms*
Affordable Housing	*Family*	*0*	*DU*
	Senior	*0*	*DU*
	Special Needs	*0*	*DU*
	Permanent Supportive	*0*	*DU*
Retail	General Retail	110.000	ksf
	Furniture Store	*0.000*	*ksf*
	Pharmacy/Drugstore	*0.000*	*ksf*
	Supermarket	*0.000*	*ksf*
	Bank	*0.000*	*ksf*
	Health Club	*0.000*	*ksf*
	High-Turnover Sit-Down Restaurant	*0.000*	*ksf*
	Fast-Food Restaurant	50.000	ksf
	Quality Restaurant	*0.000*	*ksf*
	Auto Repair	*0.000*	*ksf*
	Home Improvement	*0.000*	*ksf*
	Free-Standing Discount	*0.000*	*ksf*
	Movie Theater	*0*	*Seats*
Office	General Office	30.400	ksf
	Medical Office	*0.000*	*ksf*
Industrial	*Light Industrial*	*0.000*	*ksf*
	Manufacturing	*0.000*	*ksf*
	Warehousing/Self-Storage	*0.000*	*ksf*
School	*University*	*0*	*Students*
	High School	*0*	*Students*
	Middle School	*0*	*Students*
	Elementary	*0*	*Students*
	Private School (K-12)	*0*	*Students*
Other		*0*	*Trips*

CITY OF LOS ANGELES VMT CALCULATOR

Report 1: Project & Analysis Overview

Date: March 23, 2021
Project Name: Link US
Project Scenario:
Project Address: 800 N ALAMEDA ST, 90012

Version 1.3

Analysis Results

Total Employees: 675
Total Population: 0

Proposed Project		*With Mitigation*	
6,734	**Daily Vehicle Trips**	**6,734**	**Daily Vehicle Trips**
49,570	**Daily VMT**	**49,570**	**Daily VMT**
0	**Household VMT per Capita**	**0**	**Household VMT per Capita**
7.4	**Work VMT per Employee**	**7.4**	**Work VMT per Employee**

Significant VMT Impact?

APC: Central

Impact Threshold: 15% Below APC Average
Household = 6.0
Work = 7.6

Proposed Project		*With Mitigation*	
VMT Threshold	**Impact**	**VMT Threshold**	**Impact**
Household > 6.0	No	Household > 6.0	No
Work > 7.6	No	Work > 7.6	No

CITY OF LOS ANGELES VMT CALCULATOR

Report 2: TDM Inputs

Date: March 23, 2021
Project Name: Link US
Project Scenario:
Project Address: 800 N ALAMEDA ST, 90012

Version 1.3

TDM Strategy Inputs

Strategy Type		Description	Proposed Project	Mitigations
Parking	Reduce parking supply	City code parking provision (spaces)	100	100
		Actual parking provision (spaces)	0	0
	Unbundle parking	*Monthly cost for parking ($)*	*$0*	*$0*
	Parking cash-out	*Employees eligible (%)*	*0%*	*0%*
	Price workplace parking	Daily parking charge ($)	$6.00	$6.00
		Employees subject to priced parking (%)	100%	100%
	Residential area parking permits	*Cost of annual permit ($)*	*$0*	*$0*

(cont. on following page)

TDM Strategy Inputs, Cont.

Strategy Type		Description	Proposed Project	Mitigations
Transit	*Reduce transit headways*	*Reduction in headways (increase in frequency) (%)*	*0%*	*0%*
		Existing transit mode share (as a percent of total daily trips) (%)	*0%*	*0%*
		Lines within project site improved (<50%, >=50%)	*0*	*0*
	Implement neighborhood shuttle	*Degree of implementation (low, medium, high)*	*0*	*0*
		Employees and residents eligible (%)	*0%*	*0%*
	Transit subsidies	*Employees and residents eligible (%)*	*0%*	*0%*
		Amount of transit subsidy per passenger (daily equivalent) ($)	*$0.00*	*$0.00*
Education & Encouragement	*Voluntary travel behavior change program*	*Employees and residents participating (%)*	*0%*	*0%*
	Promotions and marketing	*Employees and residents participating (%)*	*0%*	*0%*

(cont. on following page)

TDM Strategy Inputs, Cont.

Strategy Type		Description	Proposed Project	Mitigations
Commute Trip Reductions	*Required commute trip reduction program*	*Employees participating (%)*	*0%*	*0%*
	Alternative Work Schedules and Telecommute	*Employees participating (%)*	*0%*	*0%*
		Type of program	*0*	*0*
	Employer sponsored vanpool or shuttle	*Degree of implementation (low, medium, high)*	*0*	*0*
		Employees eligible (%)	*0%*	*0%*
		Employer size (small, medium, large)	*0*	*0*
	Ride-share program	*Employees eligible (%)*	*0%*	*0%*
Shared Mobility	*Car share*	*Car share project setting (Urban, Suburban, All Other)*	*0*	*0*
	Bike share	*Within 600 feet of existing bike share station - OR- implementing new bike share station (Yes/No)*	*0*	*0*
	School carpool program	*Level of implementation (Low, Medium, High)*	*0*	*0*

(cont. on following page)

TDM Strategy Inputs, Cont.

Strategy Type		Description	Proposed Project	Mitigations
Bicycle Infrastructure	*Implement/Improve on-street bicycle facility*	*Provide bicycle facility along site (Yes/No)*	*0*	*0*
	Include Bike parking per LAMC	*Meets City Bike Parking Code (Yes/No)*	*0*	*0*
	Include secure bike parking and showers	*Includes indoor bike parking/lockers, showers, & repair station (Yes/No)*	*0*	*0*
Neighborhood Enhancement	*Traffic calming improvements*	*Streets with traffic calming improvements (%)*	*0%*	*0%*
		Intersections with traffic calming improvements (%)	*0%*	*0%*
	Pedestrian network improvements	*Included (within project and connecting off-site/within project only)*	*0*	*0*

CITY OF LOS ANGELES VMT CALCULATOR

Report 3: TDM Outputs

Date: March 23, 2021
Project Name: Link US
Project Scenario:
Project Address: 800 N ALAMEDA ST, 90012

Version 1.3

TDM Adjustments by Trip Purpose & Strategy

Place type: Compact Infill

		Home Based Work Production		*Home Based Work Attraction*		*Home Based Other Production*		*Home Based Other Attraction*		*Non-Home Based Other Production*		*Non-Home Based Other Attraction*		*Source*
		Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	
Parking	Reduce parking supply	13%	13%	13%	13%	13%	13%	13%	13%	13%	13%	13%	13%	TDM Strategy Appendix, Parking sections 1 - 5
	Unbundle parking	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Parking cash-out	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Price workplace parking	0%	0%	20%	20%	0%	0%	0%	0%	0%	0%	0%	0%	
	Residential area parking permits	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Transit	Reduce transit headways	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	TDM Strategy Appendix, Transit sections 1 - 3
	Implement neighborhood shuttle	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Transit subsidies	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Education & Encouragement	Voluntary travel behavior change program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	TDM Strategy Appendix, Education & Encouragement sections 1 - 2
	Promotions and marketing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Commute Trip Reductions	Required commute trip reduction program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	TDM Strategy Appendix, Commute Trip Reductions sections 1 - 4
	Alternative Work Schedules and Telecommute Program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Employer sponsored vanpool or shuttle	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Ride-share program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Shared Mobility	Car-share	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	TDM Strategy Appendix, Shared Mobility sections 1 - 3
	Bike share	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
	School carpool program	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	

TDM Adjustments by Trip Purpose & Strategy, Cont.

Place type: Compact Infill

		Home Based Work Production		*Home Based Work Attraction*		*Home Based Other Production*		*Home Based Other Attraction*		*Non-Home Based Other Production*		*Non-Home Based Other Attraction*		*Source*
		Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	
Bicycle Infrastructure	Implement/ Improve on-street bicycle facility	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	TDM Strategy Appendix, Bicycle Infrastructure sections 1 - 3
	Include Bike parking per LAMC	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	
	Include secure bike parking and showers	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	
Neighborhood Enhancement	Traffic calming improvements	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	TDM Strategy Appendix, Neighborhood Enhancement sections 1 - 2
	Pedestrian network improvements	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	

Final Combined & Maximum TDM Effect

	Home Based Work Production		*Home Based Work Attraction*		*Home Based Other Production*		*Home Based Other Attraction*		*Non-Home Based Other Production*		*Non-Home Based Other Attraction*	
	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated
COMBINED TOTAL	*13%*	*13%*	*30%*	*30%*	*13%*	*13%*	*13%*	*13%*	*13%*	*13%*	*13%*	*13%*
MAX. TDM EFFECT	*13%*	*13%*	*30%*	*30%*	*13%*	*13%*	*13%*	*13%*	*13%*	*13%*	*13%*	*13%*

= Minimum (X%, 1-[(1-A)*(1-B)…])
where X%=

PLACE	*urban*	*75%*
TYPE	compact infill	*40%*
MAX:	*suburban center*	*20%*
	suburban	*15%*

Note: (1-[(1-A)*(1-B)…]) reflects the dampened combined effectiveness of TDM Strategies (e.g., A, B,...). See the TDM Strategy Appendix (*Transportation Assessment Guidelines Attachment G)* for further discussion of dampening.

CITY OF LOS ANGELES VMT CALCULATOR

Report 4: MXD Methodology

Date: March 23, 2021
Project Name: Link US
Project Scenario:
Project Address: 800 N ALAMEDA ST, 90012

Version 1.3

MXD Methodology - Project Without TDM

	Unadjusted Trips	MXD Adjustment	MXD Trips	Average Trip Length	Unadjusted VMT	MXD VMT
Home Based Work Production	0	0.0%	0	6.0	0	0
Home Based Other Production	0	0.0%	0	5.1	0	0
Non-Home Based Other Production	1,941	-3.7%	1,869	8.3	16,110	15,513
Home-Based Work Attraction	978	-20.0%	782	9.1	8,900	7,116
Home-Based Other Attraction	4,442	-25.2%	3,323	6.2	27,540	20,603
Non-Home Based Other Attraction	1,941	-3.3%	1,876	7.9	15,334	14,820

MXD Methodology with TDM Measures

	Proposed Project			*Project with Mitigation Measures*		
	TDM Adjustment	Project Trips	Project VMT	TDM Adjustment	Mitigated Trips	Mitigated VMT
Home Based Work Production	-12.5%	0	0	-12.5%	0	0
Home Based Other Production	-12.5%	0	0	-12.5%	0	0
Non-Home Based Other Production	-12.5%	1,635	13,574	-12.5%	1,635	13,574
Home-Based Work Attraction	-29.7%	549	5,000	-29.7%	549	5,000
Home-Based Other Attraction	-12.5%	2,908	18,028	-12.5%	2,908	18,028
Non-Home Based Other Attraction	-12.5%	1,642	12,968	-12.5%	1,642	12,968

MXD VMT Methodology Per Capita & Per Employee

Total Population: 0
Total Employees: 675
APC: Central

	Proposed Project	*Project with Mitigation Measures*
Total Home Based Production VMT	**0**	**0**
Total Home Based Work Attraction VMT	**5,000**	**5,000**
Total Home Based VMT Per Capita	**0.0**	**0.0**
Total Work Based VMT Per Employee	**7.4**	**7.4**

Appendix B. Changes to Mitigation Monitoring and Reporting Program

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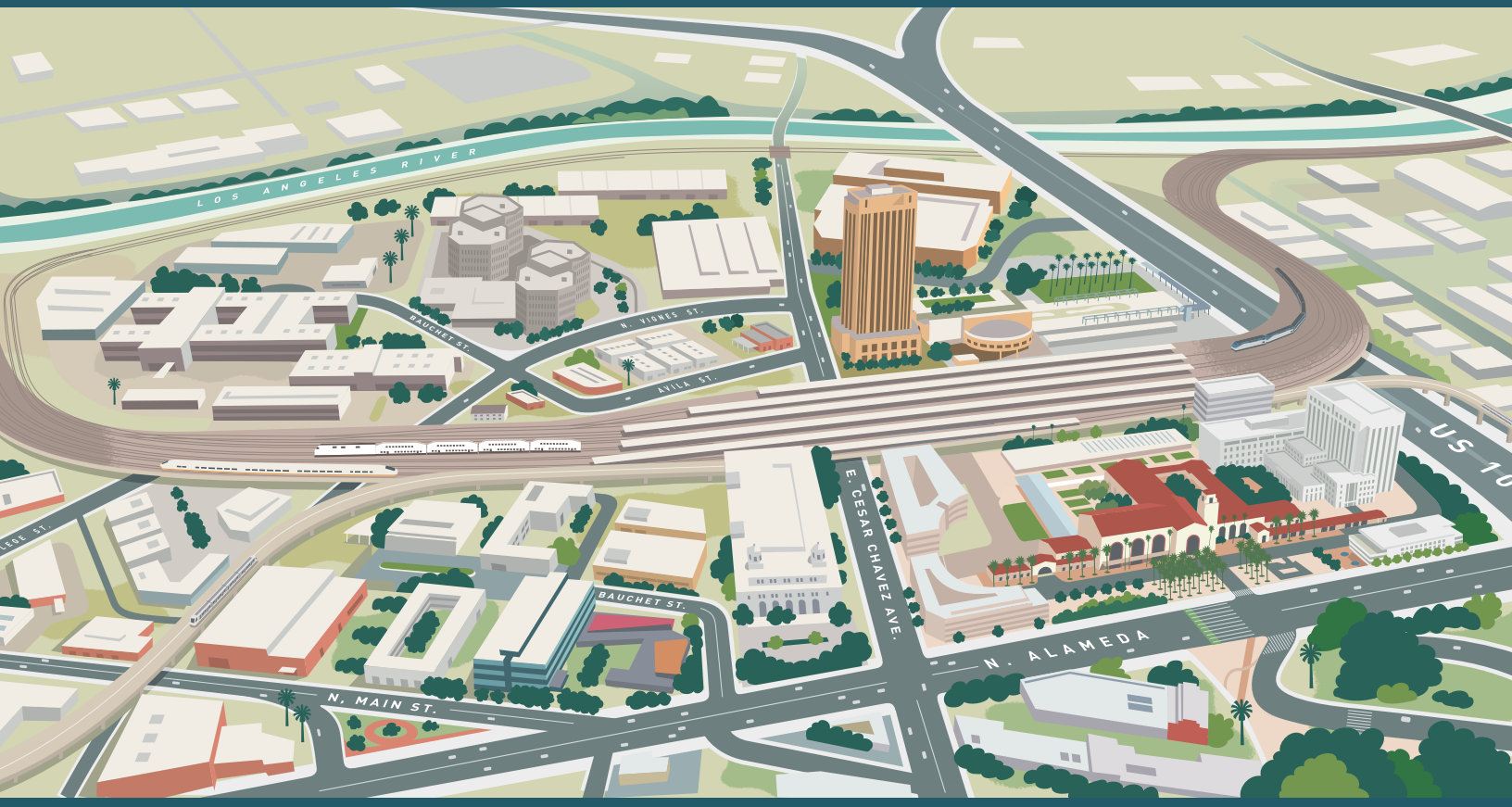
Los Angeles County
Metropolitan Transportation Authority

Link Union Station

Mitigation Monitoring and Reporting Program

~~*June 2019*~~ *October 2021*



Metro

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CONTENTS

TABLES

ACRONYMS

AB	Assembly Bill
BMP	best management practice
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CGP	construction general permit
CHC	Cultural Heritage Commission
CHSRA	California High-Speed Rail Authority
CRMMP	Cultural Resource Mitigation and Management Plan
DTSC	Department of Toxic Substance Control
EIR	environmental impact report
ESA	environmental site assessment
FTA	Federal Transit Administration
HABS	Historic American Buildings Survey
HACLA	Housing Authority of the City of Los Angeles
HCM	Historic-Cultural Monument
HMMP	Hazardous materials management plan
HSR	High-Speed Rail
IGP	industrial general permit
LA	Los Angeles
LABOE	Los Angeles Bureau of Engineering
LADOT	City of Los Angeles Department of Transportation
LAHCM	Los Angeles Historic-Cultural Monument
LAUS	Los Angeles Union Station
LID	low impact development
LOSSAN	Los Angeles-San Diego-San Luis Obispo
LUC	Land Use Covenant
MBTA	Migratory Bird Treaty Act
Metro	Los Angeles County Metropolitan Transportation Authority
MMRP	Mitigation Monitoring and Reporting Program
MOU	memorandum of understanding
NAHC	Native American Heritage Commission
NPDES	National Pollutant Discharge Elimination System
OHR	Office of Historic Resources
OSHA	Occupational Safety and Health Administration
PAH	polynuclear aromatic hydrocarbon
PMP	Paleontological Mitigation Plan
PRC	Public Resources Code
RIO	River Improvement Overlay District
ROW	right-of-way;
RWQCB	Regional Water Quality Control Board
SCAQMD	South Coast Air Quality Management District; SCORE=Southern California Optimized Rail Expansion
SCRRA	Southern California Regional Rail Authority
SWRCB	State Water Resources Control Board

SWPPP	stormwater pollution prevention plan
TMP	traffic management plan
TPH	total petroleum hydrocarbons
VOC	volatile organic compound
WEAP	worker environmental awareness program

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1.0 Introduction

Section 21081.6 of the Public Resources Code requires a lead agency to adopt a "reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment" (Section 15097 of the California Environmental Quality Act (CEQA) Guidelines provides additional direction on mitigation monitoring or reporting). As lead agency for the Proposed Project, Metro is responsible for administering and implementing the Mitigation Monitoring and Reporting Program (MMRP). The decision makers must define specific monitoring requirements to be enforced during project implementation prior to final approval of the Proposed Project. The primary purpose of the MMRP is to ensure that the mitigation measures identified in the Draft and Final Environmental Impact Report (EIR) and any subsequent addenda are implemented, effectively minimizing the identified environmental effects.

Table 1 has been prepared to ensure compliance with all the mitigation measures identified in the Draft EIR ~~and this~~, the Final EIR, and CEQA Addendum No. 1 which would ~~lessen~~ reduce or avoid potentially significant adverse environmental impacts resulting from the implementation of the Proposed Project. Each mitigation measure is identified in Table 1 and is categorized by topic and corresponding number, with identification of:

- Compliance Action/Deliverable – The criteria that would determine when the measure has been accomplished and/or the monitoring actions to be undertaken to ensure the measure has been implemented.
- Responsible Party – The entity accountable for implementing the action/deliverable.
- Enforcement Agency – The entity accountable for overseeing the implementation of mitigation.
- Implementation Phase (A or B) – The phase of the project when implementation would occur.
- Monitoring/Compliance Schedule – The compliance/monitoring schedule depends upon the progression of the overall project. Therefore, specific dates are not used within the "Schedule" column. Instead, schedule describes a logical succession of events (e.g., prior to construction, construction).
- Verification of Compliance – The monitor verifies completion of the particular mitigation measure by initialing and dating this column. Conclusion of the monitoring program concludes when all required signatures are obtained in the Verification of Compliance column.

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Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures	Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
						Initial	Date
Land Use and Planning							
LU-1 **Enhance Neighborhood Connectivity:** Consistent with the Los Angeles River Revitalization Master Plan, RIO Overlay District guidelines, LAUS Sustainable Neighborhood Assessment, City of Los Angeles Mobility Plan, Metro's LA River Path Project, and Metro's Los Angeles Union Station Forecourt and Esplanade Improvements Project, to mitigate the identified significant impact, Metro, in coordination with the City of Los Angeles, shall implement either Class II or IV type bike lanes that consist of only pavement striping and bollards (no additional right-of-way and no raised median will be required) along Commercial Street from Alameda Street to Center Street, enhancing neighborhood connectivity south of US-101. If additional funding is identified, a dedicated bicycle/pedestrian bridge over US-101 could be constructed in addition to the new bicycle lanes described above.	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A or B	During Final Design of these specific improvements	—	—
	Prepare infrastructure plans for review and approval by the City of Los Angeles	Metro	City of Los Angeles	Phase A or B	During Final Design of these specific improvements	—	—
	Implement either Class II or IV type bike lanes along Commercial Street from Alameda Street to Center Street	Contractor	City of Los Angeles	Phase A or B	Construction	—	—
Transportation and Traffic							
TR-1 **Prepare a Construction TMP:** During the final engineering phase and at least 30 days prior to construction, a construction TMP shall be prepared by the contractor and reviewed and approved by Metro, LADOT, and Caltrans, where applicable. The street closure schedules in the construction TMP shall be coordinated between the construction contractor, LADOT, Caltrans (if ramps are involved), private businesses, public transit and bus operators, emergency service providers, and residents to minimize construction-related vehicular traffic impacts during the peak-hour. During planned closures, traffic shall be re-routed to adjacent streets via clearly marked detours and notice shall be provided in advance to applicable parties (nearby residences, emergency service providers, public transit and bus operators, the bicycle community, businesses, and organizers of special events). The TMP shall identify proposed closure schedules and detour routes, as well as construction traffic routes, including haul truck routes, and preferred delivery/haul-out locations and hours so as to avoid heavily congested areas during peak hours, where feasible. The following provisions shall be included in the TMP: • Traffic flow shall be maintained, particularly during peak hours, to the degree feasible. • Access to adjacent businesses shall be maintained during business hours via existing or temporary driveways, and residences at all times, as feasible. • Metro or the contractor shall post advance notice signs prior to construction in areas where access to local businesses could be affected. Metro shall provide signage to indicate new ways to access businesses and community facilities, if affected by construction.	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
	Prepare TMP	Contractor	Metro/City of Los Angeles/Caltrans	Phase A and B	Prior to Construction	—	—
	Implement TMP during construction	Contractor	Metro/City of Los Angeles/Caltrans	Phase A and B	Construction	—	—

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures	Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
						Initial	Date
• Metro shall notify LADOT and Caltrans in advance of street closures, detours, or temporary lane reductions. • Metro shall coordinate with LADOT and Caltrans to adjust the signal timing at affected intersections and on- or off-ramps to mitigate detoured traffic volumes. • Closed-circuit television cameras shall be installed at some of the impacted intersections (as approved by LADOT) to monitor traffic in real-time by the Automated Traffic Surveillance and Control department of LADOT during construction. This will allow the city to alleviate congestion by manually changing signal timing parameters, such as allowing more green time to congested movements. • Contractor shall avoid concurrent closures of Cesar Chavez Avenue and Vignes Street north of LAUS.							
~~**TR-2 Install Traffic Signal:** Metro shall install a new traffic signal at the intersection of Center Street and Commercial Street.~~	~~Incorporate contractor responsibilities into applicable construction documents (plans and specifications)~~	~~Metro~~	~~Metro~~	~~Phase B~~	~~During Final Design~~	—	—
	~~Install traffic signal~~	~~Contractor~~	~~City of Los Angeles~~		~~During Construction~~	—	—
TR-3 Prepare Rail Operations Temporary Construction Staging Plan: During final engineering design and prior to construction, Metro shall prepare a memorandum of understanding (MOU) with each current rail operator, including, but not limited to SCRRA, LOSSAN, and Amtrak, to outline mutually agreed upon on-time performance goals to be achieved throughout construction, and how construction sequencing and railroad operational protocols would be incorporated into applicable construction documents (plans and specifications). Prior to construction, Metro and the construction contractor shall prepare detailed temporary construction staging plans for each phase of construction that the contractor would implement to maintain mutually agreed upon on-time performance goals while minimizing impacts on pedestrians and passengers at LAUS. Prior to construction, Metro and the construction contractor shall also coordinate with current rail operators to ensure that any rail-to-bus or rail-to-rail connections are uninterrupted throughout construction. Detailed temporary construction staging plans shall be deemed acceptable by the current rail operators prior to commencement of construction activities that could reduce on-time performance. Throughout the duration of construction, SCRRA shall participate in weekly construction coordination meetings to ensure that the mutually agreed upon on-time performance is met.	Prepare MOUs	Metro	Current Rail Operators (SCRRA, LOSSAN, Amtrak)	Phase A and B	Prior to Construction	—	—
	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
	Prepare temporary construction service plans	Metro/Contractor	Metro and Current Rail Operators (SCRRA, LOSSAN, Amtrak)	Phase A and B	Prior to Construction		
	Participate in weekly construction coordination meetings	Metro, in coordination with SCRRA, Amtrak and LOSSAN Rail Corridor Agency	Metro	Phase A and B	During Construction	—	—

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures	Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
						Initial	Date
Aesthetics							
AES-1 **Aesthetic Treatments:** Retaining walls in Segments 1 and 2 and the sound wall in Segment 1 shall be designed in consideration of the scale and architectural style of the adjacent William Mead Homes and Mozaic Apartments. Based on feedback received during project development from residents of the William Mead Homes property, Metro shall coordinate with HACLA regarding aesthetic enhancements to the retaining wall/sound wall at that location. Materials, color, murals, landscaping, and/or other aesthetic treatments shall be integrated into the design of the retaining wall/sound wall to minimize the dominance and scale of the retaining wall/sound wall.	Coordinate with HACLA on aesthetic enhancements	Metro	Metro	Phase B	During Final Design	—	—
	Incorporate aesthetic treatments into applicable construction documents (plans and specifications)	Metro	Metro		During Final Design	—	—
	Apply aesthetic treatments	Contractor	City of Los Angeles (HACLA)		During Construction	—	—
AES-2 **Minimize Nighttime Work and Screen Direct Lighting:** Nighttime construction activities near residential areas shall be avoided to the extent feasible. If nighttime work is required, the construction contractor shall install temporary lighting in a manner that directs light toward the construction area and shall install temporary shields as necessary so that light does not spill over into residential areas.	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	Prior to Construction	—	—
	Direct light toward the construction area and install temporary shields (as needed)	Contractor	Metro		During Construction	—	—
AES-3 **Screen Direct Lighting and Glare:** During final design, all new or replacement lighting shall comply with maximum allowable CALGreen glare ratings (California Building Standards Code 2013 – Title 24, Part 11) and shall be designed to be directed away from residential units. Screening elements, including landscaping, shall also be incorporated into the design, where feasible. Low-reflective glass and materials shall also be incorporated into the design of the new canopies to reduce daytime glare impacts.	Incorporate lighting, screening, and glare requirements into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
	Install permanent lighting that meets CalGreen requirements directed away from residences and install screening elements as needed.	Contractor	Metro		During Construction	—	—
Air Quality and Global Climate Change							
AQ-1 **Fugitive Dust Control:** In compliance with SCAQMD Rule 403, during clearing, grading, earthmoving, or excavation operations, fugitive dust emissions shall be controlled by regular watering or other dust preventive measures using the following procedures, as specified in SCAQMD Rule 403: • Minimize land disturbed by clearing, grading, and earth moving, or excavation operations to prevent excessive amounts of dust • Provide an operational water truck on site at all times; use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas; watering shall occur at least twice daily with complete coverage, preferably in the late morning and after work is done	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
	Implement dust control measures	Contractor	Metro		During Construction	—	—

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Mitigation Measures		Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
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	• Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes • Securely cover trucks when hauling materials on or off site • Stabilize the surface of dirt piles if not removed immediately • Limit vehicular paths and limit speeds to 15 miles per hour on unpaved surfaces and stabilize any temporary roads • Minimize unnecessary vehicular and machinery activities • Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway • Revegetate or stabilize disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities The following measures shall also be implemented to reduce construction emissions: • Prepare a comprehensive inventory list of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) (i.e., make, model, engine year, horsepower, emission rates) that could be used an aggregate of 40 or more hours throughout the duration of construction to demonstrate how the construction fleet is consistent with the requirements of Metro's Green Construction Policy • Ensure that all construction equipment is properly tuned and maintained • Minimize idling time to 5 minutes, whenever feasible, which saves fuel and reduces emissions • Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators, whenever feasible • Arrange for appropriate consultations with CARB or SCAQMD to determine registration and permitting requirements prior to equipment operation at the site and obtain CARB Portable Equipment Registration with the state or a local district permit for portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, as applicable These control techniques shall be included in project specifications and shall be implemented by the construction contractor.							
AQ-2	**Compliance with U.S. EPA's Tier 4 Exhaust Emission Standards and Renewable Diesel Fuel for Off-Road Equipment:** In compliance with Metro's Green Construction Policy, all off-road diesel powered construction equipment greater than 50 horsepower shall comply with U.S. EPA's Tier 4 final exhaust emission standards (40 CFR Part 1039). In addition, if not already supplied with a factory-equipped diesel particulate filter, all	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
		Use construction equipment that meets Tier 4 exhaust emissions standards.	Contractor	Metro		During Construction	—	—

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures		Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
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	construction equipment shall be outfitted with best available control technology devices certified by the CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations. In addition to the use of Tier 4 equipment, all off-road construction equipment shall be fueled using 100 percent renewable diesel.							
AQ-3	**Adaptive Air Quality Mitigation Plan:** Prior to implementation of regional/intercity rail run-through service, an Adaptive Air Quality Mitigation Plan shall be prepared by Metro, in coordination with the SCRRA, as the operator of the commuter rail service in Southern California and the program manager and grant recipient of the SCORE Program, Amtrak, and the LOSSAN Rail Corridor Agency. The Plan shall identify the methodology and requirements for annual emission inventories to be prepared by Metro, based on actual/current train movements and corresponding pollutant concentrations through the Year 2040. Mitigation Plan Requirements: Upon implementation of regional/intercity run-through service, and on an annual basis, Metro shall compile and summarize the current Metrolink, Pacific Surfliner, and Amtrak long-distance train schedules to determine the actual level of daily and peak-period train movements (including non-revenue train movements) that operate through LAUS. On an annual basis, Metro shall retain the services of an air quality specialist to conduct an annual emissions inventory to determine if actual train movements through LAUS are forecasted to increase criteria pollutant emissions to a level that would exceed the SCAQMD significance thresholds or diesel pollutant concentrations to a level that would exceed the SCAQMD's 10 in a million threshold at any residential land use in the project study area. An annual report shall be prepared by Metro that summarizes the quantitative results of pollutant emissions and diesel pollutant concentrations in the project study area. If pollutant emissions and diesel pollutant concentrations are projected to exceed the SCAQMD thresholds, the regional and intercity rail operators in coordination with Metro and California State Transportation Agency, shall either implement rail fleet emerging technologies consistent with 2018 California State Rail Plan Goal 6: Practice Environmental Stewardship, Policy 4: Transform to a Clean and Energy Efficient Transportation System (Caltrans 2018a, pg. 10 and 110), or reduce the train movements through LAUS to lower the criteria pollutant emissions below the SCAQMD significance thresholds and the diesel pollutant concentrations below the SCAQMD thresholds in the project study area. After implementation of emerging technologies, Metro shall continue to prepare an emissions inventory in coordination with SCRRA, Amtrak, and the LOSSAN Rail Corridor Agency annually to report the quantitative results of criteria pollutant emissions and diesel pollutant concentrations in	Prepare an Adaptive Air Quality Mitigation Plan	Metro, in coordination with SCRRA, Amtrak and LOSSAN Rail Corridor Agency	Metro, in coordination with SCAQMD	Phase A and B	Prior to implementation of run-through service	—	—
		Compile current train schedules/Determine actual train movements	Metro	Metro		Annually by November 1 through 2040	—	—
		Retain air quality specialist to conduct annual emissions inventory	Metro	Metro		Annually by November 1 through 2040	—	—
		Prepare Annual Report	Metro	Metro		Annually by December 31 through 2040	—	—
		Incorporate rail fleet emerging technology requirements into existing and/or future funding and/or operating agreements with provisions that require regional and intercity rail operators to replace, retrofit, or supplement some or all of their existing fleet with zero or low-emission features or reduce train movements through LAUS (only if Annual Report identifies an increase in health risks associated with diesel pollutant concentrations that would exceed SCAQMD thresholds)	Metro, in coordination with SCRRA, Amtrak and LOSSAN Rail Corridor Agency	Metro, in coordination with SCAQMD		Within 60 days of completing Annual Report (if SCAQMD thresholds are anticipated to be exceeded)	—	—

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures		Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
							Initial	Date
	the project study area. The annual report shall include an analysis of the actual (current) and proposed changes in train schedules relative to criteria pollutant emissions and diesel pollutant concentration levels in the project study area. The report shall be prepared annually by December 31 of each year, beginning the calendar year after implementation of regional/intercity rail run-through service through 2040 and shall include results of the emissions inventory and effectiveness of the measures implemented. Rail Fleet Emerging Technologies: To achieve a reduction of criteria pollutant emissions below the SCAQMD thresholds and diesel pollutant concentrations below a level that would not exceed SCAQMD thresholds, the regional and intercity rail operators may replace, retrofit, or supplement some or all of their existing fleet with zero or low-emission features. The types of emerging technologies that can be implemented, include, but are not limited to the following: • Electric multiple unit systems • Diesel multiple units • Battery-hybrid multiple units • Renewable diesel and other alternative fuels Metro shall coordinate with regional rail/intercity rail operators to incorporate these emerging technologies into existing and/or future funding and/or operating agreements to reduce locomotive exhaust emissions in the project study area.							
Noise and Vibration								
NV-1	**Construct Sound Wall:** Prior to reaching the forecasted maximum daily regional/intercity train movements through LAUS in 2031 (770 trains), Metro shall construct a sound wall up to 22 feet in height to reduce operational noise impacts at William Mead Homes. The sound wall shall be constructed of materials that achieve similar reductions or insertion loss at impacted receptors and shall have a surface density of at least 4 pounds per square foot. Metro may construct the sound wall earlier than 2031 to reduce construction-related noise impacts and/or moderate operational noise impacts from increased train movements that may occur as early as 2026.	Incorporate design requirements into sound wall	Metro	Metro	Phase B	During Final Design	—	—
		Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro		During Final Design	—	—
		Construct sound wall	Contractor	Metro		During Construction	—	—
NV-2	**Employ Noise- and Vibration-Reducing Measures during Construction:** The construction contractor shall employ measures to minimize and reduce construction noise and vibration. Noise and vibration reduction measures that would be implemented include, but are not limited to, the following: • Design considerations and project layout:	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
		Implement noise and vibration reduction measures	Contractor	Metro		During Construction	—	—
		Monitor noise and vibration levels at William Mead Homes and Mozaic	Metro	Metro		During Construction	—	—

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures	Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
						Initial	Date
o Construct temporary noise walls, such as temporary walls or piles of excavated material, between noisy activities and noise-sensitive receivers	Apartments during the loudest/most vibration intensive activities and notify Metro if FTA criteria is exceeded						
o Reroute truck traffic away from residential streets, if possible, and select streets with fewest residences if no alternatives are available o Site equipment on the construction site as far away from noise-sensitive sites as possible o Construct walled enclosures around especially noisy activities or clusters of noisy equipment (i.e., shields can be used around pavement breakers and loaded vinyl curtains can be draped under elevated structures) • Sequence of operations: o Restrict pile driving to daytime periods o Combine noisy operations to occur in the same time period ▪ The total noise level produced would not be significantly greater than the level produced if the operations were performed separately o Avoid nighttime activities to the maximum extent feasible ▪ Sensitivity to noise increases during the nighttime hours in residential neighborhoods • Alternative construction methods: o Avoid use of an impact pile driver in noise and/or vibration-sensitive areas, where possible ▪ Drilled piles or the use of a sonic or vibratory pile driver are quieter alternatives where the geological conditions permit their use o Use specially-quieted equipment, such as quieted and enclosed air compressors and properly-working mufflers on all engines o Select quieter demolition methods, where possible (e.g., sawing bridge decks into sections that can be loaded onto trucks results in lower cumulative noise levels than impact demolition by pavement breakers) In an effort to keep construction noise levels below FTA's construction noise or vibration criteria, Metro shall monitor noise and vibration during the loudest and most vibration intensive types of construction activities. Continuous construction noise and vibration monitoring shall be conducted at the first row of residences at William Mead Homes and Mozaic Apartments, within 300 feet of construction activities, approximately). Monitors shall be deployed closest to the construction activity because demonstration of compliance with the construction thresholds at the nearest locations guarantees compliance further away. If FTA's	Implement additional noise reduction methods (if FTA's construction noise and vibration criteria are exceeded)	Contractor	Metro		During Construction	—	—

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures		Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
							Initial	Date
	construction noise or vibration criteria are exceeded, the contractor shall be alerted and directed by Metro to incorporate additional noise and vibration reduction methods (examples above).							
NV-3	**Prepare a Community Notification Plan for Project Construction:** To proactively address community concerns related to construction noise and vibration, prior to construction, Metro and/or the construction contractor shall prepare and maintain a community notification plan. Components of the plan shall include initial information packets prepared and mailed to all residences within a 500-foot radius of project construction. Updates to the plan shall be prepared as necessary to indicate changes to the construction schedule or other processes. Metro shall identify a project liaison to be available to respond to questions from the community or other interested groups.	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
		Prepare community notification plan/Identify project liaison	Contractor	Metro		Prior to Construction	—	—
		Mail information packets to all residences within 500 feet of construction area	Contractor	Metro		During Construction	—	—
Biological Resources								
BIO-1	**Bats:** Preconstruction surveys for roosting special-status bats (including western mastiff bats and western yellow bats) and other native bat species shall be conducted by a Metro-approved qualified bat biologist within 2 weeks prior to construction. Surveys shall be conducted where suitable habitat and/or bridge structures that will be removed or that will have modifications to the substructure are present. All locations with suitable roosting habitat (including potential maternity roosts) shall be surveyed using an appropriate combination of structure inspection, exit counts, acoustic surveys, or other suitable methods. Surveys shall be conducted during the appropriate season and time of day/night to ensure detection of day- and night-roosting bats (i.e., preferably one daytime and one nighttime survey shall be conducted at each location with suitable roosting habitat during the maternity season, May 1 through August 31). If no roosts are detected, trees that provide suitable roosting habitat may be removed under the guidance of the qualified bat biologist. If a roost is detected, passive exclusion shall include monitoring the roost for 3 days to determine if the roost is active. If the roost is determined to support a reproductive female with young, the roost shall be avoided until it is no longer active. If the roost remains active during the 3 monitoring days and observations confirm it is not a maternity colony, a temporary bat exclusion device shall be installed under the supervision of a Metro-approved qualified bat biologist. At the discretion of the biologist, based on his or her expertise, an alternative roosting structure(s) may be constructed and installed prior to the installation of exclusion devices. Exclusion shall be conducted during the fall (September or October) to avoid trapping flightless young inside during the summer months or torpid (overwintering) individuals during the winter. If it cannot be determined whether an active roost site supports a maternity colony, the roost site shall not be disturbed, and construction within 300 feet shall be postponed or halted until the roost is vacated and the young are volant (able to fly). Exclusion efforts shall be monitored on a weekly basis and continued for	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
		Retain a qualified bat biologist	Metro	Metro		Prior to Tree Removal/Bridge Removal	—	—
		Conduct preconstruction bat surveys	Metro	Metro		During Construction	—	—
		Implement avoidance measures and/or temporary bat exclusion devices (only if a roost with active nest is detected)	Metro	Metro		During Construction	—	—

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures	Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
						Initial	Date
the duration of project construction activities and removed when no longer necessary. The following avoidance and minimization measures shall be implemented during construction: • All work conducted on bridges shall occur during the day. If this is not feasible, lighting and noise shall be directed away from night roosting and foraging areas. • Combustion equipment (such as generators, pumps, and vehicles) shall not be parked or operated under a bridge. Construction personnel shall not be present directly under a roosting colony. Construction activities shall not severely restrict airspace access to the roosts. • Removal of mature trees that provide suitable bat roosting habitat shall be conducted outside of the maternity season (May 1 through August 31); that is, removal shall be conducted between September 1 and April 30. Because bats may be present in a torpid state during the winter, suitable roosting habitat shall be removed before the onset of cold weather (approximately November 1) or as determined by a qualified bat biologist). • When removing palm trees, the dead fronds shall be removed first before felling the palm to allow any bats to escape.							
BIO–2 **MBTA Species:** Vegetation removal shall be conducted outside of the bird nesting season (February 1 through September 30) to the extent feasible. If vegetation removal cannot be conducted outside of the nesting season, a Metro-approved qualified bird biologist shall conduct preconstruction surveys to locate active nests within 7 days prior to vegetation removal in each area with suitable nesting habitat. If nesting birds are found during preconstruction surveys, an exclusionary buffer (150 feet for passerines and 500 feet for raptors) suitable to prevent nest disturbance shall be established by the biologist. The buffer may be reduced based on species-specific and site-specific conditions as determined by the qualified biologist. This buffer shall be clearly marked in the field by construction personnel under the guidance of the biologist, and construction or vegetation removal shall not be conducted within the buffer until the biologist determines that the young have fledged or the nest is no longer active. Exclusionary devices (hard surface materials, such as plywood or plexiglass, flexible materials, such as vinyl, or a similar mechanism that keeps birds from building nests) shall be installed over suitable nest sites at the bridges that will be removed or that will have modifications to the substructure before the nesting season (February 1 through September 30) to prevent nesting at the bridges by bridge- and crevice-nesting birds (i.e., swifts and swallows). Netting shall not be used as an exclusionary	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
	Retain a qualified bird biologist	Metro	Metro		Prior to Construction	—	—
	Conduct preconstruction bird surveys	Metro	Metro		Within 7 days prior to vegetation removal	—	—
	Implement/mark exclusionary buffer (only if nesting birds identified during pre-construction surveys)	Contractor	Metro		Prior to vegetation removal until nest is no longer active	—	—
	Install exclusionary devices (only if suitable nests are identified during preconstruction surveys)	Contractor	Metro	Phase B	Prior to February 1 (before bridge modifications at Vignes Street and Cesar Chavez Avenue)	—	—
	Remove bird nests	Contractor	Metro	Phase B	Prior to February 1 (before bridge modifications at Vignes Street and Cesar Chavez Avenue)	—	—

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures		Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
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	material because it can injure or kill birds, which would be in violation of the MBTA. In addition, if work on existing bridges with potential nest sites that will be removed or will have modifications to the substructure is to be conducted between February 1 and September 30, all bird nests shall be removed prior to February 1. Immediately prior to nest removal, a qualified biologist shall inspect each nest for the presence of torpid bats, which are known to use old swallow nests. Nest removal shall be conducted under the guidance and observation of a qualified biologist. Removal of swallow nests on bridges that are under construction shall be repeated as frequently as necessary to prevent nest completion unless a nest exclusion device has already been installed. Nest removal and exclusion device installation shall be monitored by a qualified biologist. Such exclusion efforts shall be continued to keep the structures free of swallows until October or the completion of construction.							
BIO-3	**Protected Trees:** Preconstruction surveys for protected trees (native trees 4 inches or more in cumulative diameter, as measured at 4.5 feet above the ground level, that are subject to protection under Ordinance No. 177404, Preservation of Protected Trees of the City of Los Angeles' municipal code, including oaks, southern California black walnut, western sycamore, and California bay), shall be conducted by a registered consulting arborist with the American Society of Consulting Arborists at least 120 days prior to construction. The locations and sizes of all protected trees shall be identified prior to construction and overlaid on project footprint maps to determine which trees may be protected in accordance with Ordinance No. 177404. The registered consulting arborist shall prepare a Protected Tree Report and shall submit three copies to the City of Los Angeles Department of Public Works. Any protected trees that must be removed due to project construction shall be replaced at a 2:1 ratio (or up to a 4:1 ratio for protected trees on private property) except when the protected tree is relocated on the same property, the City of Los Angeles has approved the tree for removal, and the relocation is economically reasonable and favorable to the survival of the tree. Each replacement tree shall be at least a 15-gallon specimen, measuring 1 inch or more in diameter, 1 foot above the base, and shall be at least 7 feet in height measured from the base.	Retain a registered arborist to conduct preconstruction surveys and prepare a Protected Tree Report	Metro	Metro	Phase A and B	180 days prior to Construction	—	—
		Conduct preconstruction protected tree surveys	Metro	Metro		120 days prior to Construction	—	—
		Prepare Protected Tree Report	Metro	Metro		Prior to Construction	—	—
		Replace and/or relocate protected trees (as needed)	Metro	Metro		Within one year of removal of protected trees	—	—
Hydrology and Water Quality								
HWQ-1	**Prepare and Implement a SWPPP:** During construction, Metro shall comply with the provisions of the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (CGP) (Order No. 2009-0009-DWQ, NPDES No. CAS000002), and any subsequent amendments (Order No. 2010-0014-DWQ and Order No. 2012-0006-DWQ), as they relate to project construction activities. Construction activities shall not commence until a waste discharger	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
		Prepare and submit Notice of Intent	Contractor/Metro	SWRCB		Prior to Construction		
		Prepare SWPPP/	Contractor	Metro/RWQCB		Prior to Construction	—	—

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures		Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
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	identification number is received from the Stormwater Multiple Application and Report Tracking System. The contractor shall implement all required aspects of the SWPPP during project construction. Metro shall comply with the Risk Level ~~1~~2 sampling and reporting requirements of the CGP. A rain event action plan shall be prepared and implemented by a qualified SWPPP developer within 48 hours prior to a rain event of 50 percent or greater probability of precipitation according to the National Oceanic and Atmospheric Administration. A Notice of Termination shall be submitted to SWRCB within 90 days of completion of construction and stabilization of the site.	Implement SWPPP (including preparation of rain event action plans)	Contractor	RWQCB		During Construction	—	—
		Prepare and submit Notice of Termination	Contractor/Metro	SWRCB		90 days prior to completion of construction	—	—
HWQ-2	**Final Water Quality BMP Selection (Caltrans ROW):** Metro shall comply with the provisions of the Caltrans Statewide NPDES Permit (Order No. 2012-0011-DWQ, NPDES No. CAS000003), effective July 1, 2013 (known as the Caltrans MS4 permit). This post-construction requirement would only apply to the US-101 overhead viaduct improvements. Metro shall prepare a stormwater data report for the plans, specifications, and estimate phase that will address post-construction BMPs for the US-101 overhead viaduct in accordance with the Caltrans Project Planning and Design Guide (latest edition).	Incorporate applicable NPDES requirements (for the portions of project within Caltrans ROW) into applicable construction documents (plans and specifications)	Metro	Caltrans	Phase A and B	Final Design	—	—
		Prepare a stormwater data report	Metro	Caltrans		Final Design	—	—
HWQ-3	**Final Water Quality BMP Selection (Railroad ROW):** For the portion of the project outside Caltrans ROW, Metro shall comply with the NPDES General Permit for Waste Discharge Requirements for Stormwater Discharges from Small MS4 (Order No. 2013-0001-DWQ, NPDES No. CAS000004), effective July 1, 2013 (known as the Phase II permit).	Incorporate applicable NPDES requirements into plans into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	Final Design	—	—
HWQ-4	**Final Water Quality BMP Selection (City of Los Angeles):** Metro shall comply with the NPDES Waste Discharge Requirements for MS4 Discharges within the Coastal Watersheds of Los Angeles County, Except Those Discharges Originating from the City of Long Beach MS4 (Order No. 2012-0175, NPDES No. CAS004001), effective December 28, 2012 (known as the Phase I Permit). This post-construction requirement shall apply to the entire project except for those portions under the jurisdiction of the Caltrans MS4 Permit and the Phase II Permit. Metro shall prepare a final LID report in accordance with the City of Los Angeles *Planning and Land Development Handbook for Low Impact Development* (LID Manual), May 9, 2016. This document shall identify the required BMPs to be in place prior to project operation and maintenance.	Incorporate applicable NPDES requirements (project wide) into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	Final Design	—	—
		Prepare a final LID report	Metro	City of Los Angeles		Final Design	—	—
HWQ-5	**Comply with Local Dewatering Requirements:** The contractor shall comply with the provisions of the General Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2013-0095, NPDES Permit No. CAG994004), effective July 6, 2013 (known as the Dewatering Permit), as they relate to discharge of non-stormwater dewatering wastes. The two options to	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
		Obtain Dewatering Permits (as needed)	Contractor	RWQCB/City of Los Angeles		Prior to Construction (Dewatering Activities)	—	—

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures		Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
							Initial	Date
	discharge shall be to the local storm drain system and/or to the sanitary sewer system, and the contractor shall obtain a permit from the RWQCB and/or the City of Los Angeles, respectively.							
HWQ-6	**Comply with Local Dewatering Requirements for Contaminated Sites:** The contractor shall comply with the provisions of the General Waste Discharge Requirements for Discharges of Treated Groundwater from Investigation and/or Cleanup of Volatile Organic Compounds-Contaminated Sites to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2013-0043, NPDES Permit No. CAG914001), effective April 7, 2013 (known as the Dewatering Permit for contaminated sites), for discharge of non-stormwater dewatering wastes from contaminated sites affected during construction. The two options to discharge shall be to the local storm drain system and/or to the sanitary sewer system, and the contractor shall require a permit from the RWQCB and/or the City of Los Angeles, respectively.	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
		Obtain Dewatering Permits for Contaminated Sites (as needed)	Contractor	RWQCB/City of Los Angeles		Prior to Construction (Dewatering Activities on Contaminated Sites)	—	—
HWQ-7	**Prepare and Implement Industrial SWPPP for Relocated, Regulated Industrial Uses:** Metro shall comply with the NPDES General Permit for Stormwater Discharges Associated with Industrial Activities (IGP; Order No. 2014-0057-DWQ, NPDES No. CAS000001) for demolished, relocated, or new industrial-related properties impacted by the project. This shall include preparation of industrial SWPPP(s), as applicable.	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
		Prepare Industrial SWPPP for relocated, regulated industrial uses	Contractor	RWQCB		Prior to Construction (on Industrial Sites)	—	—
Geology and Soils								
GEO-1	**Prepare Final Geotechnical Report:** During final design, a final geotechnical report shall be prepared by a licensed geotechnical engineer (to be retained by Metro). The final geotechnical report shall address and include site-specific design recommendations on the following: • Site preparation • Soil bearing capacity • Appropriate sources and types of fill • Liquefaction • Lateral spreading • Corrosive soils • Structural foundations • Grading practices The recommendations shall be prepared to mitigate the risk of seismic ground shaking and ground failure, including liquefaction. In addition to the recommendations for the conditions listed above, the report shall include results of subsurface testing of soil and groundwater conditions, and shall provide recommendations as to the appropriate foundation designs that	Prepare final geotechnical report	Metro	Metro	Phase A and B	During Final Design	—	—
		Incorporate site-specific recommendations of the final geotechnical report into applicable construction documents (plans and specifications)	Metro	Metro		During Final Design	—	—
		Construct infrastructure per the site-specific geotechnical recommendations	Contractor	Metro		During Construction	—	—

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Mitigation Measures	Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
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are consistent with the latest version of the CBC, as applicable at the time building and grading permits are pursued. Additional recommendations shall be included in that report to provide guidance for design of project-related infrastructure in accordance with Metro Rail Design Criteria, Manual for Railway Engineering, California High-Speed Train Project Design Criteria, California Amendments to the American Association of State Highway and Transportation Officials Load and Resistance Factor Design Bridge Design Specifications, and applicable local city codes (Appendix L of this EIR). The project shall be designed and constructed to comply with the site-specific recommendations as provided in the final geotechnical report to be prepared.							
Hazards and Hazardous Materials							
HAZ-1 **Prepare a Construction Hazardous Materials Management Plan:** Prior to construction, an HMMP shall be prepared by Metro that outlines provisions for safe storage, containment, and disposal of chemicals and hazardous materials, contaminated soils, and contaminated groundwater used or exposed during construction, including the proper locations for disposal. The HMMP shall be prepared to address the area of the project footprint, and would include, but shall not be limited to, the following: • A description of hazardous materials and hazardous wastes used (29 CFR 1910.1200) • A description of handling, transport, treatment, and disposal procedures, as relevant for each hazardous material or hazardous waste (29 CFR 1910.120) • Preparedness, prevention, contingency, and emergency procedures, including emergency contact information (29 CFR 1910.38) • A description of personnel training including, but not limited to: (1) recognition of existing or potential hazards resulting from accidental spills or other releases; (2) implementation of evacuation, notification, and other emergency response procedures; (3) management, awareness, and handling of hazardous materials and hazardous wastes, as required by their level of responsibility (29 CFR 1910) • Instructions on keeping Safety Data Sheets on site for each on-site hazardous chemical (29 CFR 1910.1200) • Identification of the locations of hazardous material storage areas, including temporary storage areas, which shall be equipped with secondary containment sufficient in size to contain the volume of the largest container or tank (29 CFR 1910.120).	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	Prior to Construction	—	—
	Prepare Hazardous Materials Management Plan	Contractor	Metro		Prior to Construction	—	—
	Implement Hazardous Materials Management Plan	Contractor	Metro		During Construction	—	—
	Prepare Phase II ESA Investigation	Metro	Metro	Phase A and B	Prior to Final Design	—	—

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Mitigation Measures	Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
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HAZ-2 **Prepare Project-wide Phase II ESA (based on completed Phase I ESA):** Prior to final design, a Phase II Environmental Site Investigation shall be prepared to focus on likely sources of contamination (based on completed Phase I ESA) for properties within the project footprint that would be affected by excavation. Phase II activities shall consist of: • Collection of soil, groundwater, and soil vapor samples from borings, for geologic analysis and collection/submittal of samples to an environmental laboratory for implementation of an analytical program. Sampling shall be based on the findings of the Phase I ESA for the project area. • Laboratory analysis of samples for contaminants of concern, which vary by location, but may include: VOCs, PAHs, TPHs, and California Title 22 metals. A Phase II ESA Report shall be prepared that summarizes the results of the drilling and sampling activities, and provides recommendations based on the investigation's findings. Metro shall implement the Phase II ESA findings. The Phase II ESA shall be conducted under the direct supervision of a Professional Geologist, licensed in the State of California, with expertise in environmental site assessments and evaluation of contaminated sites.	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro		Prior to Construction	—	—
	Implement Phase II recommendations/findings	Contractor	Metro		During Construction	—	—
HAZ-3 **Prepare a General Construction Soil Management Plan:** Prior to construction, Metro shall prepare a General Construction Soil Management Plan that includes general provisions for how soils will be managed within the project footprint for the duration of construction. Any soil imported to the project site for backfill shall be certified clean prior to use. General soil management controls to be implemented by the contractor and the following topics shall be addressed within the Soil Management Plan: • General worker health and safety procedures • Dust control • Management of soil stockpiles • Traffic control • Stormwater erosion control using BMPs	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
	Prepare Construction Soil Management Plan (project wide)	Contractor	Metro		Prior to Construction	—	—
	Implement Construction Soil Management Plan (project wide)	Contractor	Metro		During Construction	—	—
	Provide proof of certified clean imported soil	Contractor	Metro		During Construction	—	—
HAZ-4 **Prepare Parcel-Specific Soil Management Plans and Health and Safety Plans:** Prior to construction, Metro shall prepare parcel-specific Soil Management Plans for known contaminated sites and LUC-adjudicated sites for submittal and approval by DTSC. The plans shall include specific hazards and provisions for how soils will be managed for known contaminated sites and LUC-adjudicated sites. The nature and extent of contamination varies widely across the project footprint, and the	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
	Prepare parcel specific soil management plans (for known contaminated sites/LUC-adjudicated sites)	Metro/Contractor	DTSC		Prior to Construction	—	—

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	parcel-specific Soil Management Plan shall provide parcel-specific requirements addressing the following: • Soil disposal protocols • Protocols governing the discovery of unknown contaminants • Management of soil on properties within the project footprint with LUCs or known contaminants Prior to construction on individual properties with LUCs or known contaminants, a parcel-specific HASPs shall also be prepared for submittal and approval by DTSC. The HASPs shall be prepared to meet OSHA requirements, Title 29 of the CFR 1910.120 and CCR Title 8, Section 5192, and all applicable federal, state and local regulations and agency ordinances related to the proposed management, transport, and disposal of contaminated media during implementation of work and field activities. The HASPs shall be signed and sealed by a Certified Industrial Hygienist, licensed by the American Board of Industrial Hygiene. In addition to general construction soil management plan provisions, the following parcel-specific HASPs provisions shall also be implemented: • Training requirements for site workers who may be handling contaminated material • Chemical exposure hazards in soil, groundwater, or soil vapor that are known to be present on a property • Mitigation and monitoring measures that are protective of site worker and public health and safety Prior to construction, Metro shall coordinate proposed soil management measures and reporting activities with stakeholders and regulatory agencies with jurisdiction, to establish an appropriate monitoring and reporting program that meets all federal, state, and local laws for the project, and each of the contaminated sites.	Retain a Certified Industrial Hygienist to prepare parcel specific health and safety plans (for known contaminated sites/LUC-adjudicated sites)	Metro	Metro		Prior to Construction	—	—
		Prepare a parcel specific health and safety plans (for known contaminated sites/LUC-adjudicated sites)	Metro/Contractor	DTSC		Prior to Construction	—	—
		Coordinate proposed soil management measures and reporting activities with appropriate agencies including but not limited to SCRRA, City of Los Angeles, RWQCB	Metro	Metro		Prior to Construction	—	—
HAZ-5	**Land Use Covenant Sites and Coordination with the DTSC:** Prior to construction on properties with a LUC, Metro shall coordinate with the DTSC regarding any plans specified in HAZ-4, construction activities, and/or public outreach activities needed to verify that construction activities on properties with LUCs would be managed in a manner protective of public health and the environment.	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
		Coordinate with DTSC on LUC sites	Metro/Contractor	DTSC		Prior to Construction (on LUC sites)	—	—
HAZ-6	Halt Construction Work if Potentially Hazardous Materials/Abandoned Oil Wells are Encountered: Contractors shall follow all applicable local, state, and federal regulations regarding discovery, notification, response, disposal, and remediation for hazardous materials and/or abandoned oil wells encountered during the construction process.	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	Prior to Construction	—	—
		Halt work if potentially hazardous materials/abandoned wells are encountered	Contractor	Metro		During Construction	—	—

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Mitigation Measures		Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
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HAZ-7	**Compliance with the City of Los Angeles Building Code Methane Regulations:** Prior to final design, Metro shall verify that the design of infrastructure improvements located within Methane Buffer Zones (as defined by LABOE) comply with the City of Los Angeles Building Code regulations set forth in Ordinances 175790 and 180619. The ordinances require evaluation of methane hazards and mitigation of a methane hazard, if one exists, depending on the severity of the hazard.	Verify compliance with City of Los Angeles Building Code Methane Regulations	Metro	City of Los Angeles	Phase A and B	During Final Design	—	—
HAZ-8	**Pre-Demolition Investigation:** Prior to the demolition of any structures constructed prior to the 1970s, a survey shall be conducted for the presence of hazardous building materials, such as asbestos-containing materials, lead-based paints, and other materials falling under the Universal Waste requirements. The results of this survey shall be submitted to Metro, and applicable stakeholders as deemed appropriate by Metro. If any hazardous building materials are discovered, prior to demolition of any structures, a plan for proper removal shall be prepared in accordance with applicable OSHA and the Los Angeles County Department of Public Health requirements. The contractor performing the work shall be required to implement the removal plan and shall be required to have a C-21 license in the State of California, and possess an A or B classification. If asbestos-related work is required, the contractor or their subcontractor shall be required to possess a California Contractor License (Asbestos Certification). Prior to any demolition activities, the contractor shall be required to secure the site and ensure the disconnection of utilities.	Incorporate contractor responsibilities into applicable construction documents (plans and specifications)	Metro	Metro	Phase A and B	During Final Design	—	—
		Conduct pre-demolition survey (for buildings constructed prior to 1970 that require demolition)	Contractor	Metro		Prior to Building Demolition	—	—
		Prepare Removal Plan (only if hazardous building materials are discovered during the pre-demolition survey)	Contractor	OSHA/Los Angeles County Department of Public Health		Prior to Building Demolition	—	—
		Provide proof of appropriate licenses and certifications	Contractor	Metro		Prior to Building Demolition	—	—
		Secure the site and disconnect utilities	Contractor	Metro		Prior to Building Demolition	—	—
		Implement Removal Plan	Contractor	Metro		During Building Demolition	—	—
Cultural Resources								
HIST-1a	**LAUS City of Los Angeles CHC Review and Consultation:** ~~Metro shall comply with the applicable Cultural Heritage Ordinance sections for LAUS as a Historic Cultural Monument by obtaining a Permit for Substantial Alteration and/or Permit for the Demolition or Relocation of a Site, Building or Structure Designated a Monument. Per Article 1, Section 22.171.14 of the City Cultural Heritage Ordinance, no person, owner or other entity shall demolish, alter, rehabilitate, develop, construct, restore, remove, or change the appearance of any Designated HCM without first having applied for and been granted a permit. The Director of Planning may refer a permit to the CHC when there is potential discrepancy between the proposal and the standards. The CHC may vote to object or not object to the issuance of a permit, for up to 180 days, with an additional 180 day extension to the objection period upon a vote of the City Council.~~ Based on LAUS being identified as City of Los Angeles Historic-Cultural Monument #101, Metro shall consult with the City of Los Angeles Office of Historic Resources (OHR) and CHC during early design phases of the project to discuss the character-defining features of LAUS that would be altered or demolished	Consult on alterations or demolition of character-defining features of LAUS with the City of Los Angeles CHC and OHR ~~Obtain permit for substantial alteration, demolition, or removal of site, building, or structure.~~	Metro	Metro ~~City of Los Angeles Cultural Heritage Commission/Department of City Planning/Department of Building and Safety~~	Phase A and B	Prior to Construction (at LAUS)	—	—

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Mitigation Measures		Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
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	by the project. Metro shall take into consideration the feedback received from the OHR and CHC in progressing the design to completion.							
HIST-1b	**LAUS HABS-Like Documentation: Historic Resource Recordation:** Impacts resulting from the demolition or alteration of character-defining features of LAUS shall be minimized through archival documentation of as-built and as-found condition. Prior to initiation of construction work at LAUS, Metro shall ensure that documentation of the character-defining features proposed for demolition is completed in a manner similar to a HABS, Level I survey documentation. The further documentation of LAUS shall include large-format photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Secretary of the Interior's professional qualification standards for history and/or architectural history. The archival documentation shall be donated to a suitable repository, such as the City of Los Angeles Public Library. At a minimum, but not limited to, the following character-defining features shall be included in this documentation: • Pedestrian passageway • Ramps • Railings • Platforms • Butterfly shed canopies • South retaining wall • Terminal Tower • Car Supply/Maintenance Building • Cesar Chavez Avenue Undercrossing • Vignes Street Undercrossing (this bridge, which was constructed as part of LAUS, does not require additional individual HABS documentation)	Retain qualified architectural historian or historian who meets the Secretary of the Interior's professional qualification standards for history and/or architectural history	Metro	Metro	Phase A and B	Prior to Construction (at LAUS)	—	—
		Conduct HABS-Like documentation and further documentation for all character defining features at LAUS	Metro	Metro		Prior to Construction (at LAUS)	—	—
		Donate archival documentation to a suitable repository	Metro	Metro		Prior to Operation of New Modified Expanded Passageway (at LAUS)	—	—
HIST-1c	**LAUS Restoration of the Existing Passenger Concourse (west of pedestrian passageway)**: To ensure compatibility with the architecturally significant buildings that are part of LAUS and to mitigate the demolition or alteration of character-defining features at LAUS, the original passenger concourse shall be restored, where feasible, from an engineering and constructability standpoint, to its 1939 appearance in accordance with the Secretary of the Interior's Standards for Restoration. The original passenger concourse is a distinct transitional space between the waiting hall and the pedestrian passageway, having a low and flat ceiling with chamfered, rectangular columns with flared capitals. The original	Incorporate restoration design elements into applicable construction documents (plans and specifications)	Metro	Metro	Phase B	During Final Design	—	—
		Submit restoration design plans to the City of Los Angeles CHC and OHR.	Metro	Metro ~~City of Los Angeles CHC and OHR~~		During Final Design	—	—
		Implement the restoration design ~~as approved~~	Contractor	Metro ~~City of Los Angeles CHC and OHR~~		During Construction	—	—

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	passenger concourse presently contains multiple retail spaces, restrooms, Amtrak ticketing and baggage handling, and the entrance to the subterranean Red and Purple subway lines. This includes possible redesign of the entrance to the Metro Red Line Subway to be more compatible with the historic LAUS design. Metro shall design and implement the restoration in consultation with ~~and with approval from~~ the City of Los Angeles CHC and OHR prior to finalizing design.							
HIST-1d	**LAUS Educational Exhibit:** Because the passenger interface (i.e., the pedestrian passageway, ramps, railings, and butterfly shed canopies) between the trains and the architecturally significant buildings at LAUS would be demolished and replaced by a new design, an educational display shall be created by Metro and installed at LAUS that could be viewed by the public and would demonstrate the history of LAUS and how it was used by past railroad passengers. Metro shall design and implement the educational display in consultation with the City of Los Angeles CHC and OHR prior to finalizing design.	Incorporate educational display into applicable construction documents (plans and specifications)	Metro	Metro	Phase B	During Final Design	—	—
		Submit educational display design plans to the City of Los Angeles CHC and OHR	Metro	Metro ~~City of Los Angeles CHC and OHR~~		During Final Design	—	—
		Implement the educational display ~~as approved~~	Metro	Metro ~~City of Los Angeles CHC and OHR~~		During Construction	—	—
HIST-2	**William Mead Homes Consultation:** Mitigation Measure AES-1 (described in Section 3.4, Aesthetics) requires coordination with HACLA on the aesthetic treatments for the proposed retaining wall and sound wall. Metro shall send copies of pertinent consultation documentation regarding proposed retaining wall and sound wall design and/or aesthetic treatments including plans, specifications, and other documentation to the City of Los Angeles OHR to keep them apprised of the consultation process.	Submit sound wall and aesthetic treatment design plans to the City of Los Angeles OHR	Metro	Metro ~~City of Los Angeles OHR~~	Phase B	During Final Design	—	—
		Implement the aesthetic treatments as approved	Metro	Metro ~~City of Los Angeles OHR~~		During Construction	—	—
HIST-3	**Friedman Bag Company:** Textile Division Building-City of Los Angeles Office of Historical Resources Review and Consultation and HABS-Like Documentation: Prior to demolition, the character-defining features of the historical resource shall be photographed in a manner similar to HABS standards, submitted to OHR for review and approval, and the archival documentation shall be donated to a suitable repository, such as the City of Los Angeles Public Library.	Conduct HABS-like documentation of the Freidman Bag Company building	Metro	Metro ~~City of Los Angeles OHR~~	Phase A	Prior to Building Demolition (Friedman-Bay Company building)	—	—
		Submit documentation to OHR for review and approval	Metro	Metro		Prior to Building Demolition (Friedman-Bay Company building)	—	—
		Donate archival documentation to a suitable repository	Metro	Metro		Prior to Operation of Run-Through Service	—	—
HIST-4	**North Main Street Bridge City of Los Angeles Cultural Heritage Commission Review and Consultation:** Metro shall ensure that prior to construction, work proposed on all elements and character-defining features of the North Main Street Bridge, including, but not limited to, its sidewalks, decking, and wingwalls, shall follow the Secretary of Interior's Standards for the Treatment of Historic Properties, to the extent feasible. Based on the North Main Street Bridge being identified as City of Los	Ensure that work proposed on North Main Street Bridge follows the Secretary of Interior's Standards for the Treatment of Historic Properties, to the extent feasible	Metro	Metro ~~City of Los Angeles Cultural Heritage Commission/Department of City Planning/Department of Building and Safety~~	Phase A and B	Prior to Construction (at North Main Street Bridge)	—	—

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Angeles Historic-Cultural Monument #901. Metro shall consult with the City of Los Angeles Office of Historic Resources (OHR) and Cultural Heritage Commission (CHC) during early design phases of the Project to discuss the character-defining features of the North Main Street Bridge that would be altered by the Project. Metro shall take into consideration the feedback received from the OHR and CHC in progressing the design to completion. ~~The North Main Street Bridge is designated a LAHCM (#901). Pursuant to Article 1, Section 22.171.14 of the City Cultural Heritage Ordinance, no person, owner or other entity shall demolish, alter, rehabilitate, develop, construct, restore, remove, or change the appearance of the North Main Street Bridge without first having applied for and been granted a permit by the City of Los Angeles. The Director of Planning may refer a permit to the CHC when there is a potential discrepancy between the proposal and the standards. The commission may vote to object or not object to the issuance of a permit, for up to 180 days, with an additional 180 day extension to the objection period upon a vote of the City Council.~~	~~Obtain permit for any substantial alteration.~~						
	Consult on alterations to character-defining features of the North Main Street Bridge with the City of Los Angeles CHC and OHR	Metro	Metro	Phase A and B	Prior to Construction (at North Main Street Bridge)	—	—
HIST-5 **Archaeological Site CA-LAN-1575/H:** Preparation of a Cultural Resources Mitigation and Management Plan: Prior to construction, Metro's qualified archaeologist, herein defined as a person who meets the Secretary of Interior's Professional Qualification Standards in Archaeology and experienced in analysis and evaluation of the types of material anticipated to be encountered, shall develop a CRMMP that includes the treatment and management for known historical resources, determines thresholds of significance for each of the feature types that may be encountered, and the process for treating unanticipated discoveries. The CRMMP shall contain a robust research design, a data recovery plan, a monitoring plan for sensitive areas, and a plan for the analysis and long-term curation of archaeological materials recovered during construction. The CRMMP shall detail the discovery protocol if human remains and/or funerary objects, sacred objects, and objects of cultural patrimony are encountered and shall include a plan for reburial in an appropriate location. The CRMMP shall be consistent with the Secretary of Interior's Standards and Guidelines for Archaeological Documentation and the California Office of Historic Preservation's Archaeological Resources Management Reports: Recommended Contents and Format. Consulting Tribes under AB 52 for the project shall have the opportunity to review and comment on the Draft CRMMP. Provisions within the CRMMP may include arrangements with tribal representatives, for example, to respectfully reinter tribal resources on site if practicable. Caltrans shall have the opportunity to review and comment on the Draft CRMMP. The CRMMP shall include, at a minimum, the following: • ***Efforts to Preserve and Protect in Place*:** The CRMMP, per CEQA Guidelines 15162.4(b)(3), shall attempt to avoid impacts on Archaeological Site CA-LAN-1575/H and preserve in place any areas	Retain qualified archaeologist who meets the Secretary of the Interior's Professional Qualification Standards in Archaeology	Metro	Metro	Phase A and B	Prior to Construction	—	—
	Prepare CRMMP to meet minimum requirements of Mitigation Measure HIST-5	Metro	Metro/Caltrans		Prior to Construction	—	—
	Provide Draft CRMMP to AB52 consulting Tribes for review and comment	Metro	Metro		Prior to completion of the CRMMP	—	—
	Implement the CRMMP, including WEAP training, monitoring, and reporting requirements	Contractor	Metro		During Construction	—	—

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where significant components of Archaeological Site CA-LAN-1575/H are known to exist, if feasible. • ***Development of a Preconstruction Site-Specific Sensitivity Model:*** Final design feature location and the respective level and depth of ground disturbance shall serve as the basis for impacts on known locations of previously recorded archaeological features. Comparison of final design feature location with "as-built plans" especially as they relate to US-101 and historic maps for the area shall identify specific site features buried within the project study area, if any. Further, specific geotechnical boring results and past archaeological reports that identify depth of fill shall determine the level of sensitivity to encounter archaeological remains for each construction component. A three-dimensional model or other relatable graphic depiction shall be created to assist Metro with the interpretation of potential archaeological impacts. • ***Phasing of Feature Testing in Advance of Construction, Excavation, and Recovery:*** The CRMMP shall contain very specific methodology regarding testing of known features identified through the development of the sensitivity model. Due to the extreme constraints posed by the project area location (affecting public transportation through closure of roads, etc.), testing shall occur as part of the preconstruction activities. This CRMMP shall also contain specific methodology regarding feature evaluation, data recovery, and analysis for reporting. • ***Archaeological Monitoring*:** The CRMMP shall identify monitoring locations and protocols based on the final design and potential impacts. Metro shall retain archaeological monitors who will be supervised by a qualified archaeologist. All archaeological monitors shall be trained in the types of materials they may encounter. The CRMMP shall rely on an Occupational Safety and Health Administration-qualified determinations in regard to the safety of monitoring locations and the potential for contaminated soils or other hazards. • ***Native American Monitoring:*** The CRMMP shall identify Native American monitoring locations and protocols based on the final design and potential impacts. Metro shall retain Native American monitors consistent with the requirements detailed in Mitigation Measure TCR-1. The CRMMP shall rely on Occupational Safety and Health Administration-qualified determinations in regard to the safety of monitoring locations and the potential for contaminated soils or other hazards. • ***WEAP Training:*** A qualified archaeologist shall be retained to prepare a cultural resource-focused WEAP training that shall be given to all ground-disturbing construction personnel to minimize harm to Archaeological Site CA-LAN-1575/H and any previously undiscovered archaeological resources. Topics to be included for WEAP training shall be identified in the CRMMP. All site workers shall be required to complete WEAP Training, with a focus on cultural resources, including							

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education on the consequences of unauthorized collection of artifacts, and a review of discovery protocol. WEAP training shall also explain the requirements of mitigation measures that must be implemented during ground-disturbing construction activities in archaeologically sensitive areas. • ***Archaeological Reporting*:** All archaeological reports shall meet the requirements set forth for reporting in the CRMMP and be submitted to Metro. o *Evaluation and Data Recovery Reports*: Where archaeological evaluation and data recovery are required, the results shall be documented in an evaluation and data recovery report. This document shall summarize the evaluation efforts and data recovery results. For each site or feature that undergoes data recovery, the report shall be prepared in accordance with the guidelines established by the Secretary of the Interior's Standards for Archaeological Documentation and the OHP's Archaeological Resource Management Reports: Recommended Contents and Format. o *Archaeological Monitoring Report:* Metro's qualified archaeologist shall prepare a yearly written report detailing monitoring activities performed at Archaeological Site CA-LAN-1575/H and at any other previously undiscovered archaeological site. A final monitoring report shall be written by Metro's qualified archaeologist upon completion of grading and excavation activities within cultural bearing soils. The yearly report shall include the results of the fieldwork for the time period and all appropriate laboratory and analytical studies that were performed in conjunction with excavations. • ***Curation of Archaeological Collections:*** Archaeological collections are comprised of several components, including but not limited to artifacts, environmental and dating samples, field documentation, laboratory documentation, photographic records, related historical documents, and reports. All artifacts, notes, photographs, and other materials recovered during the monitoring program related to Archaeological Site CA-LAN-1575/H, and any historical resource encountered during construction shall be curated or reburied by Metro, following the specific guidelines presented in the CRMMP.							
HIST-6	**Development of a Public Participation or Outreach Plan for P-19-001575 (Archeological Site CA-LAN-1575/H):** Prior to construction, Metro shall develop a public outreach and educational plan that includes continued consultation and input from Native American Tribes consulting under AB 52; cultural resource professionals, including but not limited to, qualified archaeologists, historians, and/or architectural historians, and other potential stakeholders, such as local historic societies. The plan may include visual/educational exhibits or murals within LAUS, the development of an educational telephone application, or other published or digital educational material that may be used to inform the public regarding the	Prepare public outreach and educational plan	Metro	Metro	Phase A and B	Prior to Construction (at LAUS)	—	—

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							Initial	Date
	significance of Historic Chinatown or earlier use and sacredness of the area as it relates to Native Americans.							
PAL-1	**Prepare a PMP:** It is anticipated that Quaternary older alluvium or Puente Formation, which have a high sensitivity level, would be impacted during construction. A PMP shall be prepared by Metro's qualified Paleontologist using final excavation plans to determine where these geologic units would be impacted, and Metro shall implement the PMP prior to the start of any ground-disturbing construction activities. The PMP shall include site-specific impact mitigation recommendations and specific procedures for construction monitoring and fossil discovery. The PMP shall include a requirement for full-time paleontological monitoring if excavations would occur within native Quaternary older alluvium and/or Puente Formation, with the exception of pile-driving activities. While pile-driving activities for foundation construction may impact paleontologically sensitive sediments due to the need for foundations to be within firm strata, this activity is not conducive to paleontological monitoring, as fossils would be destroyed by the construction process. Monitoring is not recommended for excavations that only impact artificial fill and Quaternary alluvium. The PMP shall detail a discovery protocol in the event potentially significant paleontological resources are encountered during construction. For example, the contractor shall halt surface disturbing activities in the immediate area (within a 25-foot radius of the discovery), and a qualified paleontologist shall make an immediate evaluation of the significance and appropriate treatment of the encountered paleontological resources in accordance with the PMP. If necessary, appropriate salvage measures and mitigation measures shall be developed in conformance with state guidelines and best practices. Construction activities may continue on other areas of the project site while evaluation and treatment of the discovered paleontological resources take place. Work may not resume in the discovery area until it has been authorized by a qualified paleontologist.	Retain qualified paleontologist to prepare a PMP	Metro	Metro	Phase A and B	Prior to Construction	—	—
		Prepare PMP	Metro	Metro		Prior to Construction	—	—
		Implement PMP including full-time paleontological monitoring, discovery protocols, salvage measures, and evaluation and treatment of discovered paleontological resources	Metro	Metro		During Construction	—	—
PAL-2	**WEAP Training:** Metro's qualified paleontologist shall prepare a paleontological resource-focused WEAP training that shall be given to all ground-disturbing construction personnel. All site workers shall be required to complete WEAP training with a focus on paleontological resources, including a review of what to do in the case of an unanticipated fossil discovery, as identified in the PMP.	Prepare a paleontological resource-focused WEAP Training.	Metro	Metro	Phase A and B	Prior to Construction	—	—
		Provide WEAP training to all ground-disturbing construction personnel	Contractor	Metro		Prior to Construction and during construction as new personnel join the project	—	—
PAL-3	**Curation:** Significant fossils recovered during construction shall be curated by Metro in perpetuity at an accredited repository, such as the Natural History Museum of Los Angeles County. These fossils shall be prepared, identified, and catalogued for curation (but not prepared for a level of exhibition of any salvaged specimens) by Metro's qualified paleontologist. This includes removal of all or most of the enclosing sediment to reduce	Prepare, identify, and catalogue significant fossils recovered for curation	Metro	Metro	Phase A and B	During Construction	—	—
		Provide significant fossils recovered field notes, photographs, stratigraphic	Metro	Metro		Post Construction	—	—

Table 1. Mitigation Monitoring and Reporting Program

	Mitigation Measures	Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
							Initial	Date
	the specimen volume, increase surface area for the application of consolidants or preservatives, provide repairs and stabilization of fragile or damaged areas on a specimen, and allow identification of the fossils. All field notes, photographs, stratigraphic sections, and other data associated with the recovery of the specimens shall be deposited with the institution receiving the specimens.	sections, and other data associated with the recovery of the specimens to an accredited repository for curation						
HR-1	**Human Remains:** In the event that any human remains or related resources are discovered during construction, such resources shall be treated in accordance with applicable state and local regulations and guidelines for disclosure, recovery, relocation, and preservation, as appropriate. All construction affecting the discovery site shall immediately cease until the County Coroner is contacted (within 24 hours of the discovery of potential human remains, as required by CEQA Guidelines, Section 15064.5[e]), and the human remains are evaluated by the County Coroner for the nature of the remains and cause of death. The County Coroner must determine within 2 working days of being notified if the remains are subject to their authority. PRC Section 5097.98 requires that the immediate vicinity where the discovery occurred be subject to no further disturbances and be adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. If the remains are determined to be of Native American origin, the coroner shall contact the NAHC by phone within 24 hours, and the NAHC shall be asked to determine the most likely descendants who are to be notified or, if the remains are unidentifiable, to establish the procedures for burial within 48 hours of notification. All parties involved shall ensure that any such remains are treated in a respectful manner and that all applicable local, state, and federal laws are followed. This discovery protocol shall be included in the CRMMP.	Incorporate discovery protocol in the CRMMP (see Mitigation Measure HIST-5 above)	Metro	Metro	Phase A and B	Prior to Construction	—	—
TCR-1	**Native American Monitoring**: To ensure TCRs are treated with culturally appropriate dignity, Metro shall retain a Native American monitor to be present at all phases of work with the potential to impact Archaeological Site CA-LAN-1575/H. A Native American monitor shall also be present at all phases of work with the potential to impact other previously undiscovered archaeological resources related to ethnohistoric or prehistoric archaeological deposits. The Native American monitor shall be selected from a tribal group with ancestral ties to this location, to be present alongside the archaeological monitor. The CRMMP shall guide Native American monitoring and shall include details on the potential discovery of previously undiscovered ethnographic and prehistoric archaeological deposits, human remains, and other sensitive resources.	Retain Native American Monitor for all phases of work with potential to impact Archaeological Site CA LAN 1575/H or other previously undiscovered archaeological resources related to ethnohistoric or prehistoric archaeological deposits	Metro	Metro	Phase A and B	Prior to Construction	—	—
		Incorporate Native American monitor requirements into CRMMP (see Mitigation Measure HIST-5 above)	Metro	Metro		During Construction (at LAUS)	—	—

Notes:
AB=Assembly Bill; BMP=best management practice; Caltrans=California Department of Transportation; CARB=California Air Resources Board; CBC=California Building Code; CCR=California Code of Regulations; CEQA=California Environmental Quality Act; CFR=Code of Federal Regulations; CGP=construction general permit; CHC=Cultural Heritage Commission; CHSRA=California High-Speed Rail Authority; CRMMP=Cultural Resource Mitigation and Management Plan; DTSC=Department of Toxic Substance Control; EIR=environmental impact report; ESA=environmental site assessment; FTA=Federal Transit Administration; HABS=Historic American Buildings Survey; HACLA=Housing Authority of the City of Los Angeles; HCM=Historic-Cultural Monument; HMMP=Hazardous materials management plan; HSR=High-Speed Rail; IGP=industrial general permit; LA=Los Angeles; LABOE=Los Angeles Bureau of Engineering; LADOT=City of Los Angeles Department of Transportation; LAHCM=Los Angeles Historic-Cultural Monument; LAUS=Los Angeles Union Station; LID=low impact development;

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures	Compliance Action/Deliverable	Responsible Party	Enforcement Agency	Implementation Phase (A or B)	Monitoring/Compliance Schedule	Verification of Compliance	
						Initial	Date

LOSSAN=Los Angeles-San Diego-San Luis Obispo; LUC=Land Use Covenant; MBTA=Migratory Bird Treaty Act; Metro=Los Angeles County Metropolitan Transportation Authority; MOU=memorandum of understanding; NAHC=Native American Heritage Commission; NPDES=National Pollutant Discharge Elimination System; OHR=Office of Historic Resources; OSHA=Occupational Safety and Health Administration; PAH=polynuclear aromatic hydrocarbon; PMP=Paleontological Mitigation Plan; PRC=Public Resources Code; RIO=River Improvement Overlay District; ROW=right-of-way; RWQCB=Regional Water Quality Control Board; SCAQMD=South Coast Air Quality Management District; SCORE=Southern California Optimized Rail Expansion; SCRRA=Southern California Regional Rail Authority; SWRCB=State Water Resources Control Board; SWPPP=stormwater pollution prevention plan; TMP=traffic management plan; TPH=total petroleum hydrocarbons; VOC=volatile organic compound; WEAP=worker environmental awareness program